



DRAFT

PURPOSE AND NEED STATEMENT

for Tier 2, Section 6 (Martinsville to Indianapolis)

of the I-69 Evansville to Indianapolis Project

April 16, 2015

2.0 Executive Summary

This document describes the purpose and need and the project goals for Section 6 of the Tier 2 I-69, Evansville to Indianapolis Study. Section 6 begins south of the SR 39 / SR 37 interchange in Martinsville, and continues northward to I-465 in Indianapolis. This section is approximately 26 miles long. The corridor selected in Tier 1 for Section 6 is located in Morgan, Johnson, and Marion counties.

The purpose and need of a project establishes the basis for developing a range of reasonable alternatives in an EIS and assists with the identification and eventual selection of a preferred alternative. It describes the transportation and transportation-related needs which a project is designed to address. It also provides performance measures which assess the relative ability of alternatives to address the project needs. A preferred alternative is determined by assessing the relative costs and impacts of alternatives, as well as their relative ability to satisfy the purpose and need. The overall purpose and need for this project was established in the I-69 Tier 1, Indianapolis to Evansville project. This Tier 2 purpose and need applies the Tier 1 purpose and need goals to needs within the Section 6 project area.

For Purpose and Need analysis, the Section 6 Study Area includes Hendricks, Morgan, Johnson, and Marion counties. The Study Area is centered on SR 37, which is the corridor selected in Tier 1 for Section 6 of I-69. Along SR 37 there is dense development through Martinsville. From the north side of Martinsville, SR 37 enters a region characterized mainly by the natural rural environment of Morgan and Johnson counties. There is some residential and commercial development south of Marion County in Johnson County. In Marion County, there generally is high density development continuing until SR 37 intersects I-465.

This Draft Purpose and Need Statement describes the goals of Section 6, explains how these goals were determined, and introduces the performance measures that will be used to evaluate alternatives. This draft Purpose and Need Statement contains the following six sections. The first five parallel the five sections of Chapter 2—Purpose and Need in the Tier 1 Final Environmental Impact Statement (FEIS). The sixth section describes how this purpose and need, along with other considerations, supports the consideration of Section 6 alternatives which may be outside of the corridor selected in Tier 1.

- **Section 2.1—Statement of Purpose and Need** contains the Statement of Purpose and Need for Section 6 of the Tier 2 EIS.
- **Section 2.2—Transportation Plans and Policies** describes federal, state, and local policies used to determine the Purpose and Need for Section 6. State and federal policies are described in less detail



than in the Tier 1 FEIS, to which the reader is referred for further information. Local plans and policies that pertain to Section 6 are summarized, and are described in detail in the Purpose and Need Appendix.

- **Section 2.3—Needs Assessment** describes the local needs that have been identified during the scoping process for Section 6.
- **Section 2.4—Public and Agency Input** summarizes how public and agency input is used to determine the Purpose and Need.
- **Section 2.5—Project Goals and Performance Measures** identifies the local goals, describes how they support the overall project goals identified in Tier 1, and presents the performance measures that will be used to evaluate the relative ability of alternatives to achieve these goals.
- **Section 2.6—Consideration of Alternatives Outside of Tier 1 Corridor** describes how this statement of purpose and need, along with other factors, supports consideration of Section 6 alternatives outside of the corridor selected in Tier 1.

This draft document is provided for public and agency input. The Purpose and Need included in the Section 6 DEIS will take into account, as appropriate, that input.

2.1 Statement of Purpose and Need

The purpose and need identified in Tier 1 for the I-69 Evansville to Indianapolis project has been carried forward into Tier 2 and remains the foundation of the Purpose and Need for each Tier 2 Section. The purpose and need in Tier 2 involves the identification of goals specific to a particular Tier 2 Section. These local goals have been identified for each Tier 2 section as part of the scoping process in Tier 2. Therefore, the purpose and need for Section 6 consists of two parts: (1) the overall project purpose as defined in Tier 1 for the I-69 Evansville-to-Indianapolis project, and (2) local goals identified for Section 6 – Martinsville to Indianapolis as part of the Tier 2 NEPA process.

2.1.1 Tier 1 Purpose and Need for I-69 from Evansville to Indianapolis

As defined in Tier 1 EIS, the purpose of I-69 is to provide an improved transportation link between Evansville and Indianapolis that

- Strengthens the transportation network in Southwest Indiana,¹
- Supports economic development in Southwest Indiana, and
- Completes the portion of the National I-69 Project between Evansville and Indianapolis.

Core Goals

Specific goals were identified in the Tier 1 Final Environmental Impact Statement (“FEIS”) that support this overall purpose. The goals are listed below; core goals are shown in *italics*. These goals were identified in the Tier 1 FEIS as core goals of the project, based on consideration of the policy/legislative framework as well as the transportation and economic development needs assessment. ***For each of the core goals, the***

¹ “Southwest Indiana” refers to 26-county Tier 1 Study Area. See Figure 2.1 for map of Tier 1 Study Area.



selected alternative was required in the Tier 1 study to achieve a substantial improvement over existing conditions.

Transportation Goals

- Goal 1** *Improve the transportation linkage between Evansville and Indianapolis*
- Goal 2** *Improve personal accessibility for Southwest Indiana residents*
- Goal 3** Reduce existing and forecasted traffic congestion on the highway network in Southwest Indiana
- Goal 4** Reduce traffic safety problems

Economic Development Goals

- Goal 5** Increase accessibility for Southwest Indiana businesses to labor, suppliers, and consumer markets
- Goal 6** Support sustainable, long-term economic growth (diversity of employer types)
- Goal 7** Support economic development to benefit a wide spectrum of area residents (distribution of economic benefits)

National I-69 Goals

- Goal 8** *Facilitate interstate and international movement of freight through the I-69 corridor, in a manner consistent with the national I-69 policies*
- Goal 9** Connect I-69 to major intermodal facilities in Southwest Indiana

Tier 1 established goals for the entire I-69 Evansville to Indianapolis project on a regional basis. The goals addressed the entire Southwest Indiana region, which includes 26 counties and encompasses a quarter of the State of Indiana. These broad regional goals were used as the basis for evaluating alternatives in Tier 1. The analysis of those alternatives involved comparing different corridors that were 140 to 160 miles in length and were spread across a broad geographic area.

2.1.2 Tier 2 Purpose and Need for Section 6

The purpose of Section 6 is to advance the overall goals of the I-69 Evansville to Indianapolis project in a manner consistent with the commitments in the Tier 1 Record of Decision (ROD), while also addressing local needs identified in the Tier 2 process.

Listed below are the Section 6 purpose and need goals. These goals are based upon the Tier 1 purpose and need, and address local needs in the Section 6 Study Area. The following sections describe how the Tier 1 goals were used to identify these local goals for Section 6. Section 2.5 restates these goals, and gives performance measures for each goal.



- Improve transportation linkage between Martinsville and Indianapolis;
- Improve personal accessibility in the Section 6 Study Area;
- Reduce forecasted traffic congestion on the highway network in the Section 6 Study Area;
- Improve traffic safety in the Section 6 Study Area;
- Support growth in economic activity in the Section 6 Study Area;
- Facilitate freight movements in the Section 6 Study Area; and
- Support intermodal connectivity to locations in the Section 6 Study Area.

These needs are defined in greater detail below in Section 2.3, *Needs Assessment*. Preliminary alternatives are being developed in Section 6 that are consistent with the overall goals of Tier 1 and the local needs identified in this Tier 2 study.

2.2 Transportation Plans and Policies

The Purpose and Need for a major transportation project must consider plans and policies relevant to the project. These plans and policies may make direct references to the project (in this case, Section 6 of the I-69, Evansville-to-Indianapolis Project). They also may document needs (such as safety, congestion relief, economic development, etc.) which the project can address. The following text reviews relevant federal, state and regional plans/policies which specifically reference the I-69 project, as well as identify needs in the project area which this project can address.

2.2.1 Federal Legislation and Policies

In 1991, Congress passed the Intermodal Surface Transportation Efficiency Act (ISTEA), which designated “Corridor 18” from Indianapolis, Indiana, to Memphis, Tennessee, via Evansville, Indiana, as a high-priority corridor. This corridor was extended to the north and south in the National Highway System Designation Act of 1995. It was further modified in 1998 by the Transportation Equity Act for the 21st Century (TEA-21), which extended the corridor to provide a continuous link from the Canadian border to the Mexican border. In addition, TEA-21 designated Corridor 18 as “Interstate Route I-69.” The entire I-69 corridor, from Canada to Mexico, is referred to in this study as the “National I-69 Corridor.”

The National I-69 Corridor was divided into 32 Sections of Independent Utility (SIUs), each considered to be an independent project for purposes of National Environmental Policy Act (NEPA) reviews and environmental studies. The Evansville-to-Indianapolis section of I-69 was designated as SIU #3 of the National I-69 project.

In March 2004, FHWA issued a Tier 1 ROD for the Evansville-to-Indianapolis section of I-69. The Tier 1 ROD selected a “corridor” – that is, a band generally 2,000 feet in width, but narrower in some places and broader in others – for I-69 between Evansville and Indianapolis. In addition, the Tier 1 ROD divided the Evansville-to-Indianapolis project into six separate sections for purposes of more detailed Tier 2 studies. The northernmost of these six sections is Section 6, which extends from the SR 39 / SR 37 interchange in Martinsville, and continues northward to I-465 in Indianapolis.

2.2.2 State Legislation and Policies

In 2001, INDOT issued its 2000-2025 Long-Range Transportation Plan. In that plan, INDOT identified a statewide network consisting of three levels of transportation corridors: Statewide Mobility Corridors, Regional Corridors, and Local Access Corridors. The Statewide Mobility Corridors are the highest level of the network. The current Statewide Mobility Corridors include a link from Evansville to Indianapolis



via Bloomington. The current Statewide Long-Range Transportation Plan, *The Indiana 2013-2035 Future Transportation Needs Report*², retains the designations of Statewide Mobility Corridors.

This report (p. 12) describes the Statewide Mobility Corridors as:

- The “top end” of the highway system
- Providing mobility across the state
- Safe, high-speed highways
- Serving long distance trips
- Connecting Indiana’s metropolitan areas
- Connecting to other states’ metropolitan areas
- Indiana’s freight arteries
- Vital for economic development
- Connecting metropolitan areas of 25,000 or greater population

SR 37 between Bloomington and Indianapolis is shown as a Statewide Mobility Corridor. Figure 2-2 shows the Statewide Mobility Corridors.

The Indiana 2013-2035 Future Transportation Needs Report (pp. 128 ff) also addressed the eight statewide planning factors which MAP-21 identified. The following planning factors (cited in that document) are directly relevant to the I-69 Section 6 project, and are supported by the I-69 Tier 1 Purpose and Need goals.

- “Support the economic vitality of the United States, the States, and metropolitan areas, especially by enabling global competitiveness, productivity, and efficiency.”
- “Increase the safety of the transportation system for motorized and non-motorized users.”
- “Enhance the integration and connectivity of the transportation system, across and between modes throughout the state.”

2.2.3 Regional Transportation Plans

In addition to the Statewide Plan, a number of regional and local transportation plans and comprehensive land use plans are described in the Purpose and Need Appendix. These plans include proposed future transportation improvements, and identify many improvements in the Section 6 Study Area. Many of the recommendations for state and local roads provide for upgrades of existing roadway networks to serve the continued development in the northern part of the Section 6 Study Area. Some of the key elements in these plans are:

- The *Indianapolis 2035 Long Range Transportation Plan: 2014 Update* (LRTP) is the most current long range transportation plan for the Indianapolis MPO. It presents the added capacity projects (See Appendix for project lists) proposed within the Section 6 Study Area, including I-69. Several of these expansion projects are for east-west and north-south roads in the Section 6 Study Area.

² *The Indiana 2013-2035 Future Transportation Needs Report* functions as the INDOT Long-Range Transportation Plan. The development of this report was carried out under 23 CFR 450.214 federal regulations, which requires states to develop and periodically update statewide transportation plans with a minimum of a 20-year planning horizon.



Since these expansion projects are located throughout the Section 6 Study Area, it is very likely that some of them will serve traffic to and from alternatives in Section 6 of I-69. Others will provide added parallel capacity to I-69 alternatives.³ In addition, the Plan's overall goals of increased mobility and accessibility, as well as coordinating improvements to support regional economic development, also are supported by the Tier 1 purpose and need.⁴

- The *Comprehensive Plan to Johnson County (2011)* and *Johnson County Comprehensive Plan Update (2003 – East-West Corridor)* both recognize the SR 37 corridor through Johnson County as the selected location for I-69. Other added capacity projects are identified which support this corridor.
- The *2002 Thoroughfare Plan for Marion County* provides for increasing capacity within the SR 37 corridor, as well as increased capacity on portions of Southport Road and County Line Road.
- The *Comprehensive Plan for the City of Martinsville (2010)* includes the reconstruction of Ohio St. north of I-69 (which is assumed to be along existing SR 37) as a gateway into Martinsville. It also calls for extending Grand Valley Boulevard over or under I-69/SR 37.
- The *Morgan County Comprehensive Plan Phase I and Phase 2 (2007 & 2010)* and the *SR 37/SR 144 Overlay Plan (2010)* focus on planning for the construction of I-69 along existing SR 37. They include recommendations for other added capacity projects to support I-69, as well as provide specific recommendations for interchange and grade separation locations.
- The *Mooreville Comprehensive Plan (2009)* considered alternatives for added transportation capacity between Mooreville and I-69, assumed to be in the existing SR 37 corridor.
- Other plans (*Town of Avon Thoroughfare Plan (2006)*, *Plainfield Comprehensive Plan (2005 – 2025)* and *Hendricks County Quality Growth Strategy (2006)*) state the need to support regional mobility, especially to the Indianapolis International Airport. These also emphasize improved east-west and north-south access in Hendricks County.

2.3 Needs Assessment

As provided in the Tier 1 ROD, the following discussion of Section 6 local needs is based upon the Tier 1 purpose and need. This section reviews the goals of the Tier 1 purpose and need, and identifies how addressing local needs in the Section 6 Study Area supports the Tier 1 goals.

³ The list in the Appendix includes both projects which included in the fiscally-constrained plan, as well as illustrative projects (projects serving identified needs, but for which no funding is identified). Only future year projects included in the fiscally-constrained plan are part of the no-build network for traffic forecasting analysis.

⁴ The *Indianapolis 2035 Long Range Transportation Plan: 2014 Update (LRTP)* was issued by the Indianapolis MPO along with the *2014-2017 Indianapolis Regional Transportation Improvement Program (TIP)*. The projects in the TIP also are included in the LRTP.



2.3.1 Completing Section 6 of I-69 between SR 39 South of Martinsville and I-465 in Indianapolis

The completion of Section 6 of I-69 responds to the Congressional policy to complete the National I-69 corridor. This policy was adopted by Congress based on feasibility studies of the corridor. The decision by Congress to designate I-69 as a “high priority corridor” reflects a national commitment to complete this new Interstate corridor as part of the National Highway System. For this reason, the Tier 1 EIS for I-69 from Evansville to Indianapolis considered only Interstate highway alternatives. The Tier 1 EIS selected a route for the project (defined as a “corridor” generally 2,000 feet in width), and divided that corridor into six sections for Tier 2 analyses. Section 6, the project analyzed in this document, is the northernmost section of the approved I-69 Evansville to Indianapolis corridor. Based on the Tier 1 EIS and ROD, there is a need to complete I-69 as an Interstate highway between Evansville and Indianapolis, including Section 6. This meets Tier 1 P&N goals 1 and 8.

2.3.2 Improving the Evansville-to-Indianapolis Transportation Linkage

Tier 1 Goal 1 of the I-69 project (a core goal) is to “Improve the Transportation Linkage Between Evansville and Indianapolis.” Tier 1 alternatives were evaluated by their comparative travel times between Evansville and Indianapolis (from I-64 to I-465). Based on the Tier 1 EIS and ROD, there is the need to improve the transportation linkage between Evansville and Indianapolis. I-69 is complete or under construction between Evansville and Martinsville. Section 6 alternatives will be evaluated based upon their comparative travel time between the northern terminus of the Section 5 project in Martinsville, I-465 and I-69 on the northeast corner of Indianapolis.

2.3.3 Improving Regional Accessibility⁵

A number of the local transportation plans and studies (see Section 2.2.3) emphasize the importance of improving accessibility within the I-69 Section 6 Study Area. Improved personal accessibility within Southwest Indiana was a core goal in Tier 1. Improving accessibility and connectivity also are objectives both of *The Indiana 2013-2035 Future Transportation Needs Report*, as well as the Indianapolis MPO Long Range Plan. Based on the Tier 1 study and the findings of these plans, improved personal accessibility within the Section 6 Study Area will be included as part of the Purpose and Need.

2.3.4 Highway Congestion

The I-69 Section 6 Corridor Model (I-69 CM) is an update of the corridor model used in I-69 Section 5. The I-69 CM coverage area was expanded to include the western half of Hendricks County and provide more fine-grained network and demographic data where needed. The I-69 CM covers a total of 2,525 square miles utilizing a total of 2,189 traffic analysis zones. The Section 6 study area incorporates four counties: Hendricks, Johnson, Marion and Morgan Counties. As part of the Section 6 update, the model was re-calibrated to more accurately replicate travel patterns in these four counties. The Section 6 Model retains the 2010 base year of the Section 5 Model, however the design year was updated from 2035 to 2045 recognizing that I-69 Section 6 would likely not be constructed until after 2020.

⁵ Regional accessibility refers to the ease of travel to major regional destinations, such as major employment centers, educational institutions and medical institutions. Other performance measures, such as changes in vehicle miles of travel (VMT), are calculated to assess more “micro” level travel impacts, such as the need for some to travel further due to loss of through existing access routes where a new freeway (I-69) is constructed.



Traffic forecasts for the year 2045, as part of this EIS, show that there will be significant levels of congestion in Section 6. Level of service (LOS) is the method commonly used to evaluate a roadway's functionality. LOS is a measure of operational conditions. These conditions are defined in terms of factors such as speed and travel time, maneuverability, and delay. There are six levels of service, which are designated by the letters "A" through "F." LOS "A" represents the most desirable operating conditions, while LOS "F" defines the least acceptable.

INDOT's Design Manual generally calls for providing at least LOS "C" on all newly-constructed or reconstructed roads, with LOS "B" desirable (per Tables 53-1 through 53-9 of the Indiana Design Manual).⁶ Figures 2-3 and 2-4 show roads forecasted (in the year 2045) to have levels of service in the unacceptable range (LOS E, or worse). These forecasts assume that committed projects in fiscally constrained state, regional, and local transportation plans are constructed. The Purpose and Need Appendix lists all facilities shown as congested (LOS E or worse) in these forecasts. Sections 1 through 5 of I-69 are shown as completed and open to traffic. A goal of Section 6 of the I-69 Corridor is to help alleviate these congested conditions.

2.3.5 Highway Safety

Safety improvements are an important user benefit resulting from improvements to the transportation system. Benefits include reductions in the number of injuries, property damage crashes, and fatal crashes. The Tier 1 FEIS (Table 3-9) identified that the selected I-69 alternative (Alternative 3C) would directly lead to a reduction of 1,500 fatal or injury crashes annually within Southwest Indiana.

Data compiled by the Indiana University Public Policy Institute were used to determine the crash rates by roadway classification in Indiana. It was found that more fatal crashes and accidents, in general, occur on non-interstate highways. One main difference between interstates compared to US and state highways are that interstates have fully-controlled access, whereas US and state highways have partial to no access control. The data are summarized in Table 2-1. It shows that fatal crashes on Indiana interstates were 0.3 to 0.4 per 100 million vehicle miles, three to four times less than the number of fatal crashes on Indiana state-numbered highways. In other words, a driver traveling on a non-interstate state highway is three to four times as likely to be involved in a fatal crash, and as much as three times as likely to be involved in all crashes. The forecasting analysis tools used in this EIS account for the diversion of traffic to new facilities, as well as the resulting crash reductions due to any upgrades of SR 37, a partially-controlled access state-numbered highway, to a fully access-controlled Interstate highway. These crash reductions will occur throughout the Section 6 Study Area, since I-69 will serve traffic diverted from many other lower classification facilities which have significantly higher crash rates.

⁶ Exceptions to this general rule include: for urban freeways, minimum LOS "D" may be used for urban freeway reconstruction projects; for certain urban arterials, desirable LOS is "C" and minimum LOS is "D"; for all urban collectors and most local streets, desirable LOS is "C" and minimum LOS is "D" (desirable LOS is "D" for some urban local streets); for rural local roads, desirable LOS is "B" and minimum LOS is "D." Source: INDOT 2013 Design Manual, Tables 53-1, 53-5 through 53-9, accessed February 10, 2015.

Table 2.1 – Crash Rate Comparison, Indiana Highways

Facility Type	Crashes per 100 Million Vehicle Miles	
	Fatal Crashes	All Crashes
Indiana Interstate Highways	0.3-0.4	79-88
Indiana US-Numbered Highways	1.1	180-190
Indiana State-Numbered Highways	1.2-1.3	217-266
Sources: Indiana Crash Facts 2009, Indiana University Public Policy Institute, Center for Criminal Justice Research, 2010. Indiana Crash Facts 2008, Indiana University Public Policy Institute, Center for Criminal Justice Research, 2009.		

2.3.6 Supporting Regional Economic Development

Three of the Tier 1 goals (Goals 5, 6 and 7 – see section 2.1.1) provide that the I-69 project is to support economic development in the I-69 Study Area. Section 6 of I-69 is part of a Statewide Mobility Corridor. *The Indiana 2013-2035 Future Transportation Needs Report* identifies these corridors as “vital for economic development (see Section 2.2.2). It also recognizes that supporting economic vitality is a statewide planning factor in MAP-21. The *Indianapolis 2035 Long Range Transportation Plan: 2014 Update* (see Section 2.2.3) has the objective of supporting regional economic development. In accordance with the I-69 Tier 1 goals, the current INDOT statewide policies, and the Indianapolis MPO Long Range Plan, supporting economic development is a need for the I-69 Section 6 project.

2.3.7 Freight Movements

Tier 1 Goal 8 of the I-69 project is to “Facilitate Interstate and International Movements of Freight through the I-69 Corridor, in a Manner Consistent with the National I-69 Policies.” This Tier 1 goal compared reduction in truck vehicle hours of travel (VHT) among alternatives to determine which alternatives provided the greatest efficiencies to freight shipments. Facilitating freight movements also is an objective of *The Indiana 2013-2035 Future Transportation Needs Report*, as well as the *Indianapolis 2035 Long Range Transportation Plan: 2014 Update*. Given this Tier 1 goal and the importance of freight movements to facilitate economic development, improving speed and reliability of freight flows within the Study Area is a need for the I-69 Section 6 project.

2.3.8 Intermodal Connectivity

Tier 1 Goal 9 of the I-69 project is to “Connect I-69 to major intermodal facilities in Southwest Indiana.” Tier 1 identified two such major intermodal facilities in the Section 6 Study Area, the Indianapolis International Airport and the CSX Transportation intermodal facility at Avon Yard. Since the publication of the Tier 1 ROD, a third major intermodal facility, the Indiana Railroad Senate Avenue Yard, has opened. These two rail intermodal facilities are the only rail facilities in the Study Area which serve containerized intermodal freight shipments. See Figure 2-5 for a location map of major intermodal facilities. Facilitating intermodal connectivity also is an objective both of *The Indiana 2013-2035 Future Transportation Needs Report*, and the *Indianapolis 2035 Long Range Transportation Plan: 2014 Update*. Given this Tier 1 goal and the importance of intermodal facilities to stimulate economic development, improving access to major intermodal facilities is a need for the I-69 Section 6 project.

2.4 Public and Agency Input

Public involvement and coordination with regulatory and other agencies has been ongoing since the beginning of the Tier 1 process, and will continue throughout Tier 2 in developing this purpose and need and the remainder of the Environmental Impact Statement (EIS). Opportunities for public input are provided by public meetings, the I-69 project website (<http://www.in.gov/indot/projects/i69/>) and the Section 6



project office. A Section 6 project office was opened from 2004 – 2012. A new project office will be established for Section 6. It will open in spring 2015. The project office will enable interested parties to consult with project planners and engineers as well as view the most up to date maps and displays. The office will be open and staffed Monday through Friday during normal business hours.

Two Community Advisory Committees (CACs) and one Stakeholder Working Group (SWG) have been established for Section 6 to learn about local interests and to share project information. These CACs have been established to assist INDOT and FHWA by providing input on community issues and feedback on specific aspects of the Section 6 project. They also will serve as liaisons to their respective constituents and organizations. Each CAC is composed of a cross-section of affected groups, local agencies, and organizations members representing various public interests.

The North CAC consists of members within the northern portion of the study area (Hendricks, Marion, Johnson and the northern portion of Morgan County). The South CAC consists of members located within southern portion of the Study Area (City of Martinsville and southern Morgan County).

A SWG established for Section 6, includes technical experts from local communities. This group will provide technical feedback to INDOT. SWG members will also relay project information to other members within their organization.

An Expert Land Use Panel (ELUP) will be convened for Section 6. Local land use experts will assist in allocating future growth and development occurring due to I-69. This information will be used to support the corridor traffic forecasting model for Section 6.

INDOT will also sponsor a speakers' bureau for the project Study Area. This bureau will address meetings of local groups which have an interest in the I-69 project. Examples include realtor boards, Chambers of Commerce, economic development groups, etc. INDOT's role at these meeting includes making a presentation about the project and answering questions.

INDOT also hosts a project website (<http://www.in.gov/indot/projects/i69/>) and will use INDOT's existing social media (Twitter, Facebook) to communicate project information.

State and federal resource agencies will be invited to general meetings at key project milestones. These milestones include project scoping, purpose and need, and screening of alternatives. Formal agency feedback and comments will be sought at these general meetings. In addition, meetings with individual agencies will occur throughout the project.

Chapter 11 of the Section 6 DEIS, *Comments, Coordination, and Public Involvement*, will contain detailed information regarding the public and agency input process, the key issues that were raised, and how these issues were addressed in the purpose and need statement.

2.5 Project Goals and Performance Measures

Section 6 performance measures will be used to evaluate the ability of the alternatives to meet local goals which support the overall goals of the I-69, Evansville to Indianapolis project. Performance measures will be considered along with environmental impacts and cost in the overall evaluation.

As stated in sub-Section 2.1.2, **the selected action in Section 6 will support the overall project purpose identified in Tier 1 while also addressing local needs.** In Section 6, seven local goals have been preliminarily identified by reviewing existing local and regional plans, an extensive public involvement



process, and technical analysis. Continued development of the P&N will consider comments from the general public, local officials, local business owners/managers, members of the Section 6 CACs, resource agencies, and others.

Section 6 goals and their performance measures are described below, and are summarized in Table 2-2. Some or all of the alternatives may be similar in their ability to meet some of these goals.

GOAL 1: IMPROVE TRANSPORTATION LINKAGE BETWEEN MARTINSVILLE AND INDIANAPOLIS

Tier 1 Goals Supported: Goals 1 and 8

Performance Measures: *Complete Section 6 of I-69.* A new freeway would complete I-69 from Martinsville to Indianapolis. All build alternatives would be equal in their ability to satisfy this criterion.

Travel time between northern limits of I-69 Section 5 and I-465 in Indianapolis. The Tier 1 study compared travel time between I-64 and I-465 as the performance measure for this goal. I-69 is completed beginning in Evansville for Sections 1-3 and under construction in Sections 4-5 from Crane to Indian Creek south of Martinsville. The performance measure compares travel times for alternatives on the remaining portion of I-69 (Section 6).

GOAL 2: IMPROVE PERSONAL ACCESSIBILITY IN THE SECTION 6 STUDY AREA

Tier 1 Goal Supported: Goal 2

Performance Measures: *Travel time between major travel destinations in the Section 6 Study Area.* Such locations include the City of Martinsville, major educational institutions, medical institutions, and employment centers. Examples include downtown Indianapolis, IU Medical Center, Indianapolis Airport and major colleges/universities.

GOAL 3: REDUCE FUTURE TRAFFIC CONGESTION ON THE HIGHWAY NETWORK IN THE SECTION 6 STUDY AREA (MORGAN, JOHNSON, HEDRICKS AND MARION COUNTIES)

Tier 1 Goal Supported: Goal 3

Performance Measure: *Reduction of traffic congestion on area roadways.* Improvements in levels of service (LOS) by county will be calculated and compared for each alternative.

GOAL 4: IMPROVE TRAFFIC SAFETY IN THE SECTION 6 STUDY AREA (MORGAN, JOHNSON, HENDRICKS AND MARION COUNTIES)

Tier 1 Goal Supported: Goal 4

Performance Measure: *Reduction of crashes in the Section 6 Study Area.* The reduction in the number of fatal, injury, and property-damage accidents will be calculated by county for each alternative.

GOAL 5: SUPPORT GROWTH IN ECONOMIC ACTIVITY IN THE SECTION 6 STUDY AREA (MORGAN, JOHNSON, HENDRICKS AND MARION COUNTIES)

Tier 1 Goals Supported: Goals 5, 6 and 7

Performance Measures: *Increases in personal income, total employment, and employment in key employment categories in the Section 6 Study Area.* Alternatives will be compared for their ability to increase economic activity within the Study Area. The TREDIS forecasting model will be used to forecast how reductions in business costs, increases in access to buyer and supplier markets, and increases in access to labor markets will increase economic activity.



GOAL 6: FACILITATE FREIGHT MOVEMENTS IN THE SECTION 6 STUDY AREA

Tier 1 Goal Supported: Goal 8

Performance Measure: *Reductions in daily truck vehicle hours of travel (VHT) in the Section 6 Study Area.* Truck hours of travel is the measure which best reflects the relative efficiency of freight travel among alternatives. This measure captures the overall effect of alternatives on freight travel throughout the Study Area. It is comparable to the Tier 1 measure, which was comparative reduction in truck VHT among alternatives.

GOAL 7: SUPPORT INTERMODAL CONNECTIVITY TO LOCATIONS IN THE SECTION 6 STUDY AREA

Tier 1 Goal Supported: Goal 9

Performance Measure: *Travel time between key entry points into the Study Area and major intermodal centers.* Three major intermodal centers have been identified in the Study Area (CSX Avon Yard, Indianapolis International Airport, Indiana Railroad Senate Ave. Yard). Travel times between these locations and major entry points into the Study Area (Interstate highways and other multi-lane, divided highways) will be compared among alternatives.



	TABLE 2.2—SECTION 6 GOALS AND PERFORMANCE MEASURES	
TIER 1	TIER 2 Section 6	
	Section 6 Goals	Section 6 Performance Measures
GOAL 1 —Improve the transportation linkage between Evansville and Indianapolis GOAL 8 —Facilitate interstate and international movement of freight	GOAL 1— Improve Transportation Linkage Between Martinsville and Indianapolis	Complete Section 6 of I-69. Travel times between northern limits of I-69 Section 5 and I-465 in Indianapolis.
GOAL 2 —Improve personal accessibility for Southwest Indiana residents	GOAL 2— Improve Personal Accessibility in the Section 6 Study Area	Travel time between major travel destinations in the Section 6 Study Area.
GOAL 3 —Reduce existing and forecasted traffic congestion on the highway network in Southwest Indiana	GOAL 3— Reduce Future Traffic Congestion on the Highway Network in the Section 6 Study Area (Morgan, Johnson, Hendricks and Marion counties)	Reduction of traffic congestion on area roadways. Improvements in levels of service by county will be calculated and compared for each alternative.
GOAL 4 —Improve safety levels in Southwest Indiana	GOAL 4— Improve Traffic Safety in the Section 6 Study Area (Morgan, Johnson, Hendricks and Marion counties)	Reduction of crashes in the Section 6 Study Area. The reduction in the number of fatal, injury, and property-damage accidents by county will be calculated for each alternative.
GOAL 5 —Increase accessibility for Southwest Indiana businesses to labor, suppliers, and consumer markets. GOAL 6 —Support sustainable, long-term economic growth (diversity of employer types). GOAL 7 —Support economic development to benefit a wide spectrum of area residents (distribution of economic benefits).	GOAL 5— Support Growth in Economic Activity in the Section 6 Study Area (Morgan, Johnson, Hendricks and Marion counties)	Increases in personal income. Increases in total employment. Increases in employment in key employment categories.
GOAL 8 —Facilitate interstate and international movement of freight	GOAL 6— Facilitate Freight Movements in the Section 6 Study Area	Reductions in daily truck vehicle hours of travel (VHT) in the Section 6 Study Area.
GOAL 9 — Connect I-69 to major intermodal facilities in Southwest Indiana	GOAL 7 —Support Intermodal Connectivity to Locations in the Section 6 Study Area	Travel time between key entry points into the Study Area and major intermodal centers.



2.6 Consideration of Alternatives Outside of Tier 1 Corridor

This document supersedes the draft statement of Purpose and Need for the Section 6 project dated November 8, 2005. FHWA and INDOT conducted a new scoping process for the Section 6 Tier 2 EIS. As stated in the project's Notice of Intent⁷ the scoping process was, in part intended to obtain the views and issues related to considering Tier 2 alternatives for Section 6 located outside the Tier 1 approved corridor. The scoping process was also designed to obtain additional views on current local needs for the Section 6 project area. The scoping process included a kickoff meeting with resource agencies, a comparison of development patterns along the State Road 37 between 2003 and 2015, public meetings, the development of baseline traffic information, and a cursory review of potential impacts to the natural and human environment. Based on information obtained in the scoping process, as well as an analysis of current conditions within the Tier 1 Section 6 corridor, as more fully explained below, FHWA has concluded that alternatives outside the Tier 1 corridor for Section 6 should be considered in addition to alternatives within the approved corridor.

2.6.1 Public, Agency and Public Official Comments

The scoping process for the resumption of Section 6 Tier 2 studies has elicited a number of comments addressing the consideration of alternatives outside of the approved Section 6 corridor. The following section summarizes input provided by the public and resource agencies. It also provides statements made by public officials on this issue.

Public Comments

Public scoping meetings were held on February 23 and 25, 2015 in Greenwood and Martinsville. A number of comments were provided by members of the public, both during and after these meetings, regarding whether alternatives should be considered outside of the approved corridor. Sixty-seven comments were received stating that the project should consider only alternatives within the approved corridor. Approximately one hundred comments were received stating that alternatives should not follow the SR 37 approved corridor. Many of the comments in this latter category suggested specific alternatives, some that located Section 6 to the west of SR 37 and some to the east of SR 37.

Community Advisory Committee Comments

FHWA and INDOT met with two Community Advisory Committees (CAC) established for the Section 6 project. One CAC represents Martinsville & Morgan County and the other represents impacted areas of Johnson, Hendricks & Marion Counties. The CAC groups included local elected officials, chambers of commerce, Indiana Farm Bureau and other parties. FHWA and INDOT also convened a Stakeholder Working Group (SWG) on January 29, 2015. The SWG included City & County Engineers and Planners. Those groups provided much feedback on the Tier 1 corridor and the question of whether to consider alternatives outside of the approved Tier 1 Section 6 corridor. Those comments include:

⁷ Published in October 15, 2014 *Federal Register*, pp. 61926-7



- The original decision on the location of the Section 6 corridor was more than 10 years ago. Conditions have changed during the past 10 years, including large amounts of residential and commercial development that have been constructed or planned.
- The cost of the project needs considered via looking at additional alternatives. The project should strive to be a good steward of taxpayer dollars.
- Alternatives in different corridors could have different economic growth generating potential. The project should consider economic impacts and benefits for local communities, state and the region.
- Consideration should be given to moving goods and freight around the country on a regional basis.
- Impacts to adjacent interstates need assessed; construction on Tier 1 or any other alignments will have impacts on I-465, I-65 and I-70.
- Alternatives should be evaluated to assess and reduce impacts to local noise pollution & air quality.
- Local communities have made zoning changes and constructed access roads in order to prepare for I-69 on SR 37. The project needs to take local improvements and investments into consideration.
- The project needs to consider what will happen to SR 37 if I-69 is constructed off existing alignment.
- The most direct route from Martinsville to Indianapolis is SR 37. Often times the most direct route is the best.
- The Tier 1 corridor may have fewer impacts to farmland and natural resources.
- Constructing grade separations on an existing heavily used corridor, such as SR37, will benefit fire and police response times and also improve the safety of school bus routes.

Agency Comments

An agency scoping meeting was held on February 17, 2015. Fifteen agencies were invited to the meeting; ten attended and written comments were received from five agencies. Following is a summary of these written comments, as they relate to consideration of alternatives outside of the approved Section 6 corridor.

- **Indiana Department of Natural Resources, Division of Historic Preservation and Archaeology (IDNR-DHPA).** In a March 12, 2015 letter, IDNR-DHPA stated that while it is aware of cultural resources in and near the approved corridor, it has no recommendations for alternative alignments. It did not state a position (either in support or opposition) regarding consideration of alternatives outside of the approved corridor.
- **Indiana Department of Natural Resources, Division of Fish and Wildlife (IDNR-DFW).** In a March 17 letter, IDNR-DFW cited issues with possible alternatives outside of the selected Section 6 corridor. These included a new White River crossing, as well as other aquatic and habitat impacts for alternatives to the west of SR 37. It cited significant agricultural impacts for alternatives east of SR 37. It also cited the potential for impacts to developed urban areas for alternatives outside of the SR 37 corridor. It requested that if alternatives other than the Tier 1 corridor are considered, that there be a detailed explanation as to why similar analyses of alternatives outside of the corridor were not conducted in Sections 1 through 5. If alternatives using I-70 are considered, it requested



a detailed explanation as to why such consideration is appropriate when alternatives using I-70 were not selected in Tier 1.

- **United States Environmental Protection Agency (USEPA), Region 5.** In a March 19 letter, USEPA requested, with regard to considering alternatives outside the selected corridor, that relevant factors which have changed since the Tier 1 ROD be clearly documented. These factors should include environmental conditions, transportation demand, development patterns, laws and regulations. It also requested that interstate highway alternatives be integrated with additional modes such as bicycle/pedestrian facilities, mass transit (including bus rapid transit) and High Occupancy Vehicle lanes.
- **Indiana Department of Environmental Management, Office of Water Quality (IDEM-OWQ).** IDEM-OWQ provided comments in an e-mail dated March 19. It described two areas which should be avoided by any alternatives, due to their habitat and aquatic impacts. These are the area north of the Morgan/Hendricks county line between I-70 and SR 67, and the area east of SR 39 between SR 42 and SR 67. See Figure 2-6 for a location map of these resource areas.
- **United States Fish and Wildlife Service (USFWS).** USFWS provided comments in an e-mail dated March 19. Its primary concerns were that any alternatives avoid impacts to habitat for Indiana or northern long-eared bats. It also expressed concerns about any alternatives which would provide a new White River crossing. It also stated that alternatives should avoid mitigation areas in Morgan, Marion and Hendricks counties. It also stated its support for recommendations by IDNR-DFW and IDEM-OWQ.

2.6.2 Recommendation to Consider Alternatives Outside of the Approved Corridor

Based upon the scoping comments received from the public, the CAC, the SWG, and the resource agency, FHWA intends to consider alternatives outside the Tier 1 Section 6 corridor. Below is a summary of the rationale for this conclusion. This rationale will be more fully described in the Screening of Alternatives report at the next major project milestone.

- ***Significant changes in activity centers related to freight and economic activity.*** Five of the nine Tier 1 Purpose and Need goals (Goals 5, 6, 7 8 and 9) provide for supporting economic activity and the freight flows on which economic activity depends. Since the Tier 1 ROD, there have been noteworthy changes in activity centers for freight flows in the Indianapolis area.

The present Indianapolis International Airport Midfield Terminal was not considered when the Tier 1 alternatives were scoped, screened, and finalized in 2003, since it wasn't completed until 2008. All traffic forecasts in the Tier 1 EIS assumed that access to the airport was from the east of the airport via I-465. The Airport Expressway (now renamed the Sam Jones Expressway) exited I-465 at mile marker 11. Access to the airport terminal now is provided west of the prior access point requiring exiting I-465 at mile marker 9 via a new interchange on I-70. The airport exit is now on I-70 at mile marker 68 south of the airport, approximately 7 miles west of the previous access point. This new access point would require four miles additional travel from the SR 37 corridor, compared to the previous access point. Figure 2-5 is a map showing the previous and existing access points to the airport.



Also, a new major intermodal rail terminal (the Indiana Railroad Senate Avenue Terminal) has opened since the close of Tier 1. This terminal is located near downtown Indianapolis. It provides access to rail traffic to and from the west coast of the United States. It allows intermodal freight to and from the west coast to avoid rail traffic congestion and delays associated with using intermodal facilities in the Chicago area.

These new/relocated facilities allow for significant changes in patterns of freight flows and resulting economic activities in the Indianapolis region. Considering alternatives outside of the corridor provides the opportunity to assess alternatives which may better satisfy local needs which support Tier 1 Purpose and Need Goals 5 through 9.

- ***Avoiding significant impacts within the Section 6 Corridor selected in Tier 1.*** The Tier 1 ROD (Section 2.3.5) gives the flexibility to consider alternatives outside the selected corridor to avoid significant impacts within the selected corridor. The Tier 1 FEIS (pp. 5-34 through 5-37) acknowledged significant development occurred north of SR 144 in the years immediately prior to its publication in 2003.

Since then, significant development has continued in the corridor, especially near the proposed Southport Road interchange. The Tier 1 FEIS referred to the potential for additional development along SR 37, however, more development has occurred than that considered in the Tier 1 FEIS. Figures 2-8 through 2-11 show locations of new development in the SR 37 corridor. The red circles shown in the last sequence of aerial photos indicate areas where new buildings or more intense land use has occurred. Figures that do not have red circles did not show new development from 2003 to 2014.

Near I-465 and SR 37, development has largely been:

- Expansion and development of industrial mines for sand and/or gravel;
- Expansion of commercial buildings including building of larger warehouses and addition of new buildings on commercially used lands;
- Conversion of agricultural lands for commercial development including warehouses, gas stations, and shopping centers.

In southern Marion County and northern Johnson County south of Southport Road, development has largely been:

- Conversion of agricultural lands into commercial development including gas stations and stand-alone business, including a pharmacy and a veterinary clinic;
- Conversion of agricultural lands to residential land use including new subdivisions, the expansion of existing subdivisions and new and expanded apartment complexes;
- Conversion of agricultural lands into industrial mines for sand and/or gravel.

In the Martinsville area development has largely been:

- Conversion of agricultural lands into commercial development for strip centers;
- Expansion of commercial areas to include new buildings or shopping centers.

With the exception of a few churches and individual residential buildings, there has been minimal development along State Road 37 between State Road 144 and State Road 252.

Eleven years have passed since the Tier 1 FEIS and ROD were issued. This passage of time, standing alone, supports taking a new look at whether other alternatives between Martinsville and



Indianapolis, better meet the purpose and need for the project. Considering alternatives outside of the corridor has the potential to avoid significant impacts to residents and businesses in the corridor.

- ***Public input provides rationale for looking at additional alignments*** – As described in Section 2.6.1, public outreach has been performed with resource agencies, two public meetings, and two Community Advisory Committees. These groups provided valuable feedback for reasons to stay on the Tier 1 corridor and reasons to look outside the Tier 1 corridor. The wide variety of feedback received supports the decision to look at multiple corridors.

Out of the 133 comments received between February 20 and March 12, 2015, 87 of these contained route suggestions. Forty percent of the comments received were in favor of I-69 Section 6 remaining within the existing State Road 37 corridor, while the remaining 60 percent were in favor of an alternate route off of the State Road 37 corridor. Of the comments suggesting an alternate, 34 percent were in favor of a corridor to the west of State Road 37, 6 percent were in favor of a corridor to the east of State Road 37, and the remaining 20 percent simply mentioned that they did not want the corridor to be on State Road 37 but made no mention of where the corridor should be.

Of the 133 comments received, the top four concerns mentioned were traffic (42 mentions), human impacts (33 mentions), impacts to residential areas, schools and local businesses, and interchange locations (22 mentions), and schedule concerns (19 mentions).

⁸After publication of the Tier 1 ROD, the Indiana state legislature in 2005, passed a law (Indiana Code, 8-15-2-1 and 8-15-5.5.) that created some doubt about the use of SR 37 through Perry Township in Marion County as part of I-69. While the existence of that law could have provided support for looking at alternatives outside the corridor, the Legislature has since passed a bill repealing that 2005 law. This legislation is waiting on the governor's signature, as of April 15, 2015.



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APPENDIX A

Purpose and Need Appendix

Regional and Local Plan Reviews

2045 Congestion Forecasts



Regional and Local Planning Documents

Indianapolis MPO

The *Indianapolis 2035 Long Range Transportation Plan (LRTP): 2014 Update* and *2014-2017 Indianapolis Regional Transportation Improvement Program (TIP)* prepared by the Indianapolis Metropolitan Planning Organization (IMPO), was last updated on March 5, 2014. The update was made to demonstrate conformity with new ozone air quality standards promulgated by the U.S. Environmental Protection Agency. The update extended the horizon year of the LRTP to 2035.

The Plan covers the area known as the Indianapolis Metropolitan Planning Area (MPA), including all or portions of Marion, Boone, Hamilton, Hendricks, Hancock, Johnson, Morgan, and Shelby Counties. Four of these counties constitute the Section 6 Study Area: Marion, Johnson, Hendricks and Morgan counties. The most recent LRTP (March 2014) presents the local and state added-capacity projects¹ (See Tables 1 and 2) proposed within the Section 6 Study Area:

Table 1 – Local Added Capacity Transportation Projects

Facility	Location	Sponsor	Project Description
<i>Period One Projects: 2011 – 2015</i>			
Ronald Reagan Pkwy	CR 200 S to CR 100 S	Hendricks County	New 4-ln. roadway
Emerson Ave	Shelbyville Road to I-65	Indianapolis	Widen 2-ln. to 4-ln. div.
Perimeter Pkwy NE, Phase 1	Township Line Rd. from Dan Jones Rd. to US 40	Plainfield	W 2-ln. to 5-ln.
<i>Period Two Projects: 2016 - 2025</i>			
Ronald Regan Parkway	56 th St. in Hendricks County to SR 267/I-65 Interchange in Boone Co.	Boone/Hendricks Co.	New 4 ln. div. roadway
E-W Corridor (Worthsville Rd)	I-65 to US 31	Greenwood	Widen 2-ln. to 4-ln. divided
CR 100N (10 th Street)	Raceway Rd. to SR 267	Hendricks Co. / Avon	Widen 2-ln. to 4-ln. Blvd.
Southport Rd.	Bluff to East Street (US 31)	Indianapolis	Widen 2-ln. to 4-ln. div
E-W Corridor	Clark School Rd. to Southport Rd.	Johnson County	New 2-ln. road
Perimeter Road Pkwy NE, Phase 2	SR 267 to Dan Jones Rd.	Plainfield	Widen 2-ln. to 5-ln.
Perimeter Road SW (CR600S)	Center St. to Moon Rd.	Plainfield	Widen 2-ln. to 4-ln.

¹ The distinction between local versus state projects is that local added-capacity projects use local funds to match federal funds, and state added-capacity projects use state funds to match federal funds.

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Facility	Location	Sponsor	Project Description
<i>Period Three Projects: 2026 - 2035</i>			
CR 200N (21 st Street)	Dan Jones Rd. to Persimmon Grove	Avon	Widen 2-ln. to 4-ln. Blvd.
CR 100S (Morris St.)	Ronald Reagan Pkwy to SR 267	Avon	Widen 2-ln. to 4-ln. Blvd.
C.R. 625 E / Witham Rd.	W Northfield Dr. to CR 800 N	Brownsburg	New alignment and bridge over I-74
(E-W Corridor) Worthsville Road Connector	SR 135 to just east of the South 5 Points Road Intersection	Greenwood	Widen 2-ln. to 4-ln. div.
Smith Valley Rd.	Meridian (SR 135) to S. Emerson Ave. (north turn)	Greenwood	Widen 2-ln. to 4-ln. div.
Bluff Rd.	West St. to Troy Ave.	Indianapolis	Widen 2-ln. to 4-ln. div.
County Line Rd.	SR 37 to Morgantown Rd.	Indianapolis	Widen 2-ln. to 4-ln. div.
County Line Rd.	Five Points to Franklin Rd.	Indianapolis	New 2-ln. on 4-ln. div. ROW
(E-W Corridor) Stones Crossing	SR 37 to SR 135	Johnson Co.	Widen 2-ln. to 4-ln. div.
(E-W Corridor) Clark School Rd.	CR 300 E to Johnson/Shelby County Line	Johnson Co.	Widen 2-ln. to 4-ln. div.
CR 200 N	SR 144 to US 31	Johnson Co.	Widen 2-ln. to 4-ln. div.
Whiteland Rd.	CR 225 E to I-65	Johnson Co.	Widen 2-ln. to 4-ln. div.
CR 800E (Dan Jones Rd.)	CR 300S to CR 200N	Avon	Widen 2-ln. to 4-ln. Blvd.
<i>Illustrative</i>			
Mann Rd.	Kentucky Ave. to Southport Rd. (Phase 1 – Ky Rd. to I-465)	Indianapolis	Widen 2-ln. to 4-ln div.
Southport Rd.	Mann Rd. to SR 37	Indianapolis	Widen 2-ln. to 4-ln div.
Camby Rd.	Kentucky Ave. to Mooresville Rd.	Indianapolis	Widen 2-ln. to 4-ln div.
Camby Rd. Extension	Mooresville Rd. to Mann. Rd.	Indianapolis	New 2 ln. on 4-ln. div. ROW
Mann Rd.	Kentucky Ave. to Southport Rd. (Phase II: I-465 to Southport Road +1 Interchange at I-465	Indianapolis	Widen 2-ln. to 4-ln. div.
Southport Rd.	Emerson Ave to Franklin Rd.	Indianapolis	Widen 2-ln. to 4-ln div.
Co. Line Rd.	Morgantown to SR 135	Indianapolis	Widen 2-ln. to 4-ln div.

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Facility	Location	Sponsor	Project Description
AmeriPlex Parkway/Camby Road Connector	AmeriPlex Parkway to SR 67 (KY. Ave.) to Camby Rd.	Indianapolis	New 4-ln. rd.
Smith Valley Rd.	Mann. Rd. to SR 37	Johnson Co.	New 2-ln. on 4-ln. div. ROW
CR 144	SR 37 to Whiteland Rd.	Johnson Co.	Widen 2-ln. to 4-ln. div.
Whiteland Rd.	CR 144 to SR 135	Johnson Co.	Widen 2-ln. to 4-ln. div.
Perimeter Pkwy NW	Vestal Rd. to SR 267	Plainfield	Widen 2-ln to 4-ln.
Perimeter Pkwy SW	South approach at US 40 to Hadley Rd. (CR 600S).	Plainfield	Widen 2-ln. to 5-ln.

Table 2 – State Added Capacity Transportation Projects

Facility	Location	Sponsor	Project Description
<i>Period One Projects: 2011 – 2015</i>			
I-69	I-69 at SR 37	INDOT	Interchange Mod. (Hamilton County)
SR 135 (Meridian St.)	CR 700N (Stones Crossing Rd.) to CR 850 N (Curry Rd.)	INDOT	Widen 2 ln. to 5 ln.
I-465 West leg	I-70 (west leg) to I-65 (NW leg)	INDOT	Widen 6 ln. div. to 10 ln. div.
I-465 Northeast	.35 mi E of US 31 to .5 mi W of Allisonville Rd.	INDOT	Widen 6 ln. div. to 10 ln. div.
I-465 South	I-465 / I-65 south side interchange	INDOT	Interchange Mod.
I-465 Northeast	I-465 / Keystone and Allisonville interchange	INDOT	Interchange Mod.
SR 39	SR 67 to south of the White River bridge crossing; 0.4 miles	INDOT	Bridge replacement / w 2 ln. to 4 ln. road widening
I-70	Post Road to Mt. Comfort Rd.	INDOT	Widen 4 ln. div. to 6 ln. div.
US 40 (Washington Street)	From 1.57 miles W Marion/Hancock COL at Grassy Crk to Buck Crk	INDOT	Widen 4 ln. to 5 ln.
<i>Period Two Projects: 2016 - 2025</i>			
I-70	.7 m W of SR 39 to .5 m E of SR 267	INDOT	Added travel lanes
I-69 Indy to Evansville	MPA Boundary to I-465	INDOT	New 4 lane freeway/widening of SR 27

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Facility	Location	Sponsor	Project Description
I-65	Southport Road to .7 m. S of SR 44	INDOT	Added travel lanes
Worthsville Road / I-65	Worthsville Road	INDOT	New Interchange
<i>Illustrative</i>			
SR 135 (Meridian St.)	CR 500N (Whiteland Rd.) to CR. 700 N (Stones Crossing Rd.)	INDOT	Widen 2-ln. to 5-ln.

Indianapolis MPO Long Range Plan Goals

Goals and Objectives are also identified in the IMPO's LRTP. The following goals from the LRTP support with the I-69 Purpose and Need goals. Objectives for each specific goal are identified under each goal.

Goal 2: Enhance regional transportation mobility and accessibility.

Objective 1: Provide cost-effective transportation improvements to address identified mobility problems and reduce the growth in traffic congestion.

Objective 2: Provide appropriate travel options and choices for all users, including auto, transit, paratransit, bicycle and pedestrian.

Objective 3: Improve accessibility to regional employment and activity centers.

Objective 4: Enhance connections between modes.

Objective 5: Support commercial goods movement within and through the region.

Goal 3: Coordinate transportation system improvements to be consistent with regional values.

Objective 1: Partner with state and local jurisdictions to ensure transportation and land use are complementary.

Objective 2: Enhance transportation system sustainability and minimize impacts of the transportation system to the built and natural environment.

Objective 3: Support regional economic development

Objective 4: Support transportation security

Other Local Plans and Studies

There are a number of local plans and studies that address the transportation needs of the Study Area for Section 6. Portions of the plans cited here support the I-69 Tier 1 Purpose and Need, and identify how the Tier 1 goals correspond to local needs in the Section 6 Study Area.

Official Thoroughfare Plan for Marion County, June 2002

The 2002 *Thoroughfare Plan for Marion County*, prepared by the City of Indianapolis Department of Metropolitan Development (DMD), lists Marion County's transportation projects of both regional



significance (mirroring the content of the MPO's Transportation Plan at the time of adoption) and local interest. The Thoroughfare Plan lists an added capacity project for SR 37, rather than the I-69 highway expansion. Proposed improvements in the 2002 Thoroughfare Plan that are consistent with the Indianapolis MPO LRTP within the Study Area include:

- Widening of State Road 37 from four lanes to six lanes between I-465 and the Marion/Johnson County Line Road;
- Widening of Southport Road from two lanes to four between US 31 (Meridian Street) and Mann Road;
- Widening of County Line Road from two lanes to four between Morgantown Road and State Road 37;

Comprehensive Plan Update for Johnson County, Indiana (2011)

The 2011 Comprehensive Plan for Johnson County updated the county's previous 1997 Plan. Johnson County is located south of Indianapolis and is comprised of nine townships. The northern two-thirds of the county, including Franklin, Greenwood, Bargersville, Whiteland and New Whiteland is within the Indianapolis MPO planning jurisdiction. Blue River Township, including the city of Edinburgh, in the southeast corner of the county is also in the Indianapolis MPO planning jurisdiction.

Within the Section 6 Tier II Study Area, future transportation improvements documented in this plan were identified in categories based on the source and/or status of each identified project. Those included in the Indianapolis MPO Regional Transportation Plan include (dates show as listed in Indy MPO LRTP):

- Worthsville Road, from I-65 to US 31: widen from 2 lanes to 4 lanes divided, City of Greenwood, 2011-2020.
- I-65, at Main Street/Greenwood Rad interchange, from southbound exit ramp to Sheek Road: interchange modifications, INDOT, 2006-2010.
- I-65, from 0.5 mile south of Main Street to 0.5 mile south of County Line Road plus 1 interchange: widen from 6 lanes divided to 8 lanes divided, INDOT, 2011-2020.
- I-69, from Marion County line to SR 144: new 6-lane freeway generally aligned along existing SR 37, INDOT, 2011-2020.
- I-65, from 0.5 mile south of SR 44 to 0.5 mile south of Greenwood Road: widen from 4 lanes divided to 6 lanes divided, INDOT, 2021-2030.

Those identified in the Indianapolis MPO LRTP as illustrative projects² include:

- Smith Valley Road, from Mann Road to SR 37: new location 2 lane roadway on 4-lane divided right-of-way.
- East-West Corridor

² "Illustrative projects" are identified as desirable, but are not included in a fiscally-constrained project list.

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- Along existing CR 144; from SR 37 to CR 500 N: widen from 2 lanes to 4 lanes divided.
 - Along existing CR 500 N; from CR 144 to SR 135: widen from 2 lanes to 4 lanes divided.
 - Along existing CR 700 N (Stones Crossing Road); from SR 135 to CR 125 W: widen from 2 lanes to 4 lanes divided.
 - Along existing CR 750 N; CR 125 W to CR 100 W; 4 lanes divided.
 - Along existing CR 750 N; CR 100 W to US 31; widen from 2 lanes to 4 lanes divided.
 - Along existing CR 750 N; I-65 to CR 325 E; widen from 2 lanes to 4 lanes divided.
 - From CR 325 E to CR 400 E; 4 lanes divided.
 - Along existing CR 700 N; CR 400 E to Shelby County Line; widen from 2 lanes to 4 lanes divided.
- SR 135 from SR 252 to SR 144: widen from 2 lanes to 4 lanes, INDOT.
 - SR 144, from Johnson Road (CR 400 E) to CR 200 N: widen from 2 lanes to 4 lanes, INDOT.
 - SR 44, from SR 144 at CR 200 N to SR 44 at Eastview Drive: new 4 lane roadway, INDOT.
 - Widen I-65 from 4 lanes divided to 6 lanes divided from .5 mile south of SR 44 to the Shelby County Line including new interchange at Worthsville Road, INDOT.

The plan also included a list of transportation improvement projects of local interest. They include:

- SR 44/ SR 144: widening of SR 44 from east of I-65 to SR 144 (in Franklin), and widening SR 144 from SR 44 in Franklin to I-69;
- County Line Road (CR 1100 N): widening from SR 135 to I-69; and
- Smith Valley Road (CR 900 N): widening from SR 135 to I-69.

Johnson County Comprehensive Plan Update - 2003 East-West Corridor. April 21, 2003 Prepared by the Johnson County East-West Corridor Task Force, the intent of the East-West Corridor Plan was to update the 1997 Johnson County Comprehensive Plan. Specific revisions included amending the County Long Range Thoroughfare Plan to anticipate and accommodate future growth and vehicular traffic, to guide future land use decisions, and to improve east-west traffic flow through the northern portion of Johnson County. The 1997 plan identified four principal east-west roads in the northern part of Johnson County.

However, developments since the adoption of the 1997 Comprehensive Plan, such as the continued transformation of White River Township from a rural to suburban residential character and the increased cost of right-of-way acquisition because of this continued development, led to identifying a single primary east-west route (Peeples, 2005). According to the Plan, the selected primary east-west corridor includes two options that involve the connection of County Road 144 to SR 37. The purpose of an east-west corridor is to serve existing and future traffic resulting from extensive residential and commercial development in Johnson County

This Plan identifies the construction of I-69 between Indianapolis and Evansville using the existing SR 37 alignment through Johnson County. The probability of the construction of I-69 on SR 37 has heightened the importance of providing an improved primary east-west corridor (Johnson County, 2003). According to the County, it will continue to prioritize other east-west routes, including a planned extension of Smith



Valley Road into Morgan County with a bridge over the White River. However, a primary east-west corridor with access controls to limit the interruption of its high speed function is still planned (Peeples, 2005).

Morgan County Comprehensive Plan Phase 1 and Phase 2 (2007 & 2010) and the SR 37/SR 144 Overlay Plan (2010)

Morgan County divided the work for its Comprehensive Land Use plan into two phases. The first phase, completed by HNTB Corporation created a set of goals and objectives. The second phase, completed by the Economic Growth Team created an implementation plan for the goals and objectives. A third plan, the SR 37/SR 144 Overlay Plan was prepared at the same time as the second phase. It was developed in anticipation of I-69 being built through Morgan County following existing SR 37. The recommendations for transportation projects included in these plans are the following:

- Widen SR 144 between Johnson Road and SR 37.
- Set alignment and acquire right-of-way for Henderson Ford Road and Pennington Road extensions.
- SR 39 bypass including road realignment south and west of Martinsville and new White River Bridge (complete).
- Specific recommendations for grade separations and interchange locations for I-69 include:
 - Grade Separations: Paragon Road, Burton Lane, Grand Valley Boulevard (South Street), Teeters Road, Myra Lane, Egbert Road, Perry Road, Waverly/Whiteland Road, and Banta Road.
 - Interchanges: Liberty Church Road, SR 39 (Morton Avenue), Ohio Street (Mahalasville Road), SR 252/SR 44, Henderson Ford Road, Big Bend Road, and SR 144.
- Frontage roads on both sides of interstate connecting Liberty Church Road to Paragon Road may eliminate need for grade separation at Paragon Road.
- Frontage road between Liberty Church Road and Old SR 37 on east side of I-69, including existing portions of Hacker Creek Road to serve Morgan Monroe State Forest.
- Frontage roads to connect businesses on Burton Lane to Morton Avenue (SR 39) on the north as well as other businesses to Burton Lane on the south.
- Frontage road to connect Burton Lane to Ohio Street (both sides of interstate).
- East of the SR 252/SR 44 interchange, a new street is needed extending to the Walmart and business park development.
- Extend Old SR 37 to Teeters Road on west side of interstate.
- Realign Henderson Ford Road to connect into Centennial Road at the Henderson Ford Road interchange.

Section 6 – Purpose and Need Appendix



- Extend Old SR 37 north of I-69 to connect to Perry Road.
- Pedestrian/Equestrian crossing at Perry Road at Crooked Creek Bridge.
- Realign Big Bend Road on both sides of interstate to accommodate an interchange at this location.
- Frontage road from Waverly Road to Whiteland Road east of I-69.
- Frontage Road from Banta Road to SR 144 east of I-69.

Martinsville Comprehensive Plan (2010)

The City of Martinsville updated its Comprehensive Plan in 2010. The plan noted some key projects associated with the I-69 project but referred to the SR 37/SR 144 Overlay Plan for a more comprehensive list of transportation improvements. The key projects called out in this Comprehensive Plan include the reconstruction of Ohio Street north of I-69 to provide a better entryway into the downtown and extending Grand Valley Boulevard to South Street across SR 37 (proposed I-69) as an overpass or underpass. This extension would provide a connection across the interstate for vehicular and pedestrian traffic.

Mooreville Comprehensive Plan (2009)

Completed in 2009 by the Economic Growth Team, the Mooreville Comprehensive Plan identified two key corridor considerations directly related to the I-69 project. The first involved widening SR 144 from Johnson Road to SR 37 (location of proposed I-69 interchange). The project was listed in the then-current INDOT LRP, which showed widening SR 144 from a 2 lane to 4 lane facility between 2026 and 2030. The second consideration will be far more costly and is considered an alternative to the SR 144 widening. It would involve improving either Landerdale Road or Handley Road from SR 67 to Mann Road with an extension (new facility) to SR 37 at Smith Valley Road. The extension would involve a new White River Bridge crossing. The plan also noted that changing the designation of Johnson County Road 144 to SR 144 between SR 37 and SR 135 and widening it from 2 lanes to 4 lanes was part of the then-current INDOT LRP to occur between 2026 and 2030.

Town of Avon Thoroughfare Plan (2006 Update)

Avon updated its Thoroughfare Plan in 2006, following the Comprehensive Plan Update which occurred in 2005. This plan is a transportation planning tool which outlines how a transportation system needs to be configured to support the community's future needs. As part of the Town's Comprehensive Plan, it is based on the Land Use Plan and designates which routes need to be dedicated as "Thoroughfares" so the Town of Avon can adopt appropriate right-of-way and roadway design standards. This Thoroughfare Plan considers all modes of transportation which are, or could be, made available to the public.

The following projects have regional significance which could support the construction of I-69:

- Added travel lanes at the intersection of Dan Jones Road and US 36.
- Added travel lanes along CR 100N from the Ronald Reagan Parkway to CR 1050.
- Added travel lanes along US 36 from Old US 36 to Raceway Road.

Section 6 – Purpose and Need Appendix



- CR 100N Corridor Study from SR 267 to Raceway Road.
- CR 100S Corridor Study from CR 625 to Raceway Road.

Plainfield Comprehensive Plan 2005 – 2025

The Town of Plainfield is located within Guilford, Liberty and Washington Townships, in southeast Hendricks County. The Plainfield Comprehensive Plan, prepared by HNTB Corporation, is a detailed plan intended to guide growth and development for Plainfield. The plan addresses a wide variety of planning issues, including future land use plans, growth management policies, zoning policies and transportation planning.

Goals and Objectives were developed for each planning area. The goal statement for transportation is listed below:

Goal Statement: Establish the location, character and capacity of Plainfield's transportation facilities to be compatible with the Future Land Use Plan, specifically protecting and maintaining existing gateway corridors, including Perimeter Parkway. Plan for future road and street improvements and alignments to be compatible with emerging land uses, and provide adequate capacities to serve future growth.

Objectives:

- Implement street improvements which are of the appropriate scale and capacity to serve long-range traffic demands, while respecting the scale and of surrounding neighborhoods and development.
- Establish and reserve new public street alignments and adequate rights-of-way in future development areas by establishing strategies for transportation implementation and phasing in conjunction with the development of properties.
- Coordinate transportation improvements with other jurisdictions including INDOT, Avon, Mooresville, Indianapolis Airport Authority and Indianapolis MPO.
- Require that right-of-way on identified corridors be dedicated to the Town to ensure enough property to support the widening and other improvements to the corridor.
- Strengthen identified north-south and east-west accesses in order to implement the future land use plan.

It includes the following projects of regional significance which could support the construction of I-69:

- Construction of a loop around the Indianapolis Airport known as Perimeter Road. Much of this project has already been completed.
- Added travel lanes along SR 267 from US 40 to just past I-70.
- Future upgrades to Dan Jones Road between Avon and Plainfield.
- Added travel lanes to Hadley Road from South Center Street to SR 267.
- Construction of the Ronald Reagan Parkway from I-70 to I-65 (Boone County).
- Added travel lanes to Stafford Road from SR 267 to the Ronald Reagan Parkway.



- Construction of local circulators in the vicinity of the Indianapolis Airport.

Hendricks County Quality Growth Strategy (2006) A Quality Growth Strategy Plan was prepared by RATIO Architects, Strategic Development Group and The Planning Group, Inc. for Hendricks County. The plan guides land use, open space and farmland conservation; public infrastructure; and growth management for the next several years. Two core principles for transportation planning are included in the document: 1) Provide an efficient hierarchy of transportation choices; and 2) Provide compact, efficient infrastructure.

This plan includes the following projects of regional significance which could support the construction of I-69:

- Construction of the Ronald Reagan Parkway from I-70 to I-65 (Boone County).
- Added travel lanes along US 36 from Old US 36 to Raceway Road.
- Construction of a bypass around the town of Danville.
- Realignment of SR 39, project limits to be determined.
- Added travel lanes along Stafford Road from SR 267 to the Ronald Reagan Parkway.

2045 No Build Existing + Committed Scenario

Roads in the Section 6 Study Area with a forecasted LOS below "D"

Hendricks County

Urban Highways

- US 136 from SR 267 to Ronald Reagan Pkwy – LOS F
- I-65 from I-465 to 71st St – LOS F

Urban Streets

- SR 267 from S of 56th St to N of CR 700 N – LOS F
- SR 267 from Airport Rd to CR 500N – LOS F
- Center St From Stafford Rd to US 40 – LOS F
- CR 600N from Odell St to Dale Schrier Dr – LOS F

Rural Highways

- SR 39 from Keller Hill Rd to US 40 – LOS E
- US 36 from SR 75 to CR 200W – LOS E
- EB I-70 from W of SR 39 to SR 267 – LOS E
- SR 39 from US 136 to WB I-74 Ramps – LOS E
- US 136 from CR 550E to CR 600 E – LOS F
- SR 267 from CR 900N to Boone Co Line – LOS E

Rural Local Roads

- CR 100N from Kingsway Dr to SR 267 – LOS F



Section 6 – Purpose and Need Appendix

- CR 300E from CR 350S to Main St – LOS E
- CR 1000N from SR 267 to Ronald Reagan Pkwy – LOS E
- CR 450S from Perry Rd to Ronald Reagan Pkwy – LOS F
- CR 600N from W of Ronald Reagan Pkwy to CR1000 E – LOS F
- Raceway Rd from CR 100N to 16th St – LOS E
- CR 400 E from CR 700 S to US 40 – LOS E

Johnson County

Urban Highways

- US 31 from Madison Ave to Smith Valley Rd – LOS F

Urban Streets

- Smith Valley Rd from Peterman Rd to SR 135 – LOS F
- SR 135 from Main St to Fairview Rd – LOS F
- Main St from Howard Rd to Meridian St – LOS F

Rural Highways

- NB I-65 from CR 500N to CR 950N – LOS E
- SR 44 from I-65 to Shelby Co Line – LOS E
- SR 252 from US 31 to CR 800E – LOS F
- SR 135 from CR 700S to SR 44 – LOS E
- NB I-65 from CR 800E to SR 44 – LOS F
- SR 144 from Harriman Ave to SR 135 – LOS F

Rural Local Roads

- CR 950N from CR 300E to CR 825E – LOS E
- CR 950N from Emerson Ave to I-65 – LOS F
- Smith Valley Rd from Morgantown Rd (West Leg) to Morgantown Rd (East Leg) – LOS F
- Old US 31 from US 31 to CR 250S – LOS E
- CR 100E from CR 300S to CR 125S – LOS E

Marion County

Urban Highways

- WB I-74 from Post Rd to Shelby Co Line – LOS F
- WB I-70 from I-465 to Hancock Co Line – LOS F
- WB I-70 from Shadeland Ave to Rural St – LOS F
- I-65 from Southport Rd to I-70 – LOS E/F
- I-65/70 East of Downtown Indianapolis – LOS F
- I-65 from Kessler Blvd to I-65 – LOS F
- SB I-65 from Lafayette Rd to Kessler Blvd – LOS E
- SB I-69 from 96th St to 82nd St – LOS E
- I-69 from I-465 to 82nd St – LOS F
- I-65 from 71st St to Hendricks Co Line – LOS F
- SB I-465 to SB I-65 and NB I-65 to NB I-465 Ramps – LOS F
- NB I-465 to WB I-74 and EB I-74 to SB I-465 Ramps – LOS F
- I-465 from I-65 to I-74 – LOS F
- I-465 from Shadeland Rd to US 40 – LOS E
- WB 56th St to NB I-465 Ramp – LOS F



Section 6 – Purpose and Need Appendix

- NB I-465 from Shadeland Ave to I-69 – LOS E
- Binford Blvd from S of 75th St to I-465 – LOS F
- I-465 from Allisonville Rd to I-69 – LOS F
- EB I-465 from US 421 to US 31 – LOS E
- NB I-465 to WB I-70 Ramp - LOS E
- NB I-465 to WB Rockville Rd Ramp – LOS F
- WB Washington St to NB I-465 Ramp – LOS F
- EB I-465 from Harding St to US 31 – LOS E
- EB I-70 from Harding St to West St – LOS E

Urban Streets

- 11th St from University Blvd to West St – LOS F
- Kessler Blvd from 30th St to N of 56th St – LOS F
- 86th St from I-465 to Zionsville Rd – LOS F
- 71st St from I-65 to Lafayette St – LOS F
- 82nd St from Keystone Ave to River Rd – LOS F
- Post Rd from I-70 to S of 30th St – LOS F
- Sargent Rd from 86th St to 96th St – LOS F
- 30th St from Shadeland Ave to Franklin Rd – LOS F
- 82nd St from W of I-69 to E of Hague Rd – LOS F
- Kessler Blvd from W of Binford Blvd to Fall Creek Rd – LOS F
- Fall Creek Rd from College Ave to 30th St – LOS F
- Kessler Blvd from W of US 31 to College Ave – LOS F
- US 135 from I-465 to Hanna Ave – LOS F
- 96th St from Sugar Mill Rd to E of College Ave – LOS F
- Township Ln from 86th St to 96th St – LOS F
- 96th St from Mayflower Park Dr to US 421 – LOS F
- US 52 from German Church Rd to County Line Rd – LOS F
- US 36 from 56th St to N of 65th St – LOS F
- NB SR 37 from Thompson Rd to I-465 – LOS E
- County Line Rd from Peterman Rd to Railroad Rd – LOS F
- Southeastern Rd from Arlington Ave to US 421 – LOS F
- Sunnyside Rd from US 36 to 59th St – LOS F
- Stop 11 Rd from Sherman Dr to E of Emerson Ave – LOS F
- Stop 11 Rd from Shelby St to US 31 – LOS F
- Mann Rd from Thompson Rd to WB I-465 Ramp – LOS F
- Muessing St from US 40 to 10th St – LOS F
- Fort Wayne Ave from Puryear St to 10th St – LOS F
- College Ave from S of 86th St to 96th St – LOS E
- 75th St from W of Shadeland Ave to Blue Creek Dr – LOS F

I-69 EVANSVILLE TO INDIANAPOLIS TIER 2 STUDIES

Section 6 – Purpose and Need Appendix



Morgan County

Urban Highways

- NB SR 37 to SR 39 Ramp – LOS E

Urban Streets

- SR 42 from Indiana St to SR 67 – LOS F
- SR 144 from SR 67 to Crimson King Pkwy – LOS F
- SR 39 from Poston Rd to Morton Ave – LOS E
- Mahalasville Rd from SR 37 to N of Bills Rd – LOS F

Rural Highways

- SR 252 from SR 37 to SR 135 – LOS E
- SR 135 from S of SR 252 to Johnson Co Line – LOS E
- SR 67 from E of Paragon Rd to W of Bain Rd – LOS E
- EB I-70 from SR 39 to Hendricks Co Line – LOS E
- EB I-70 from W of CR 1100W to W of SR 39



APPENDIX B

Purpose and Need Appendix

Figures

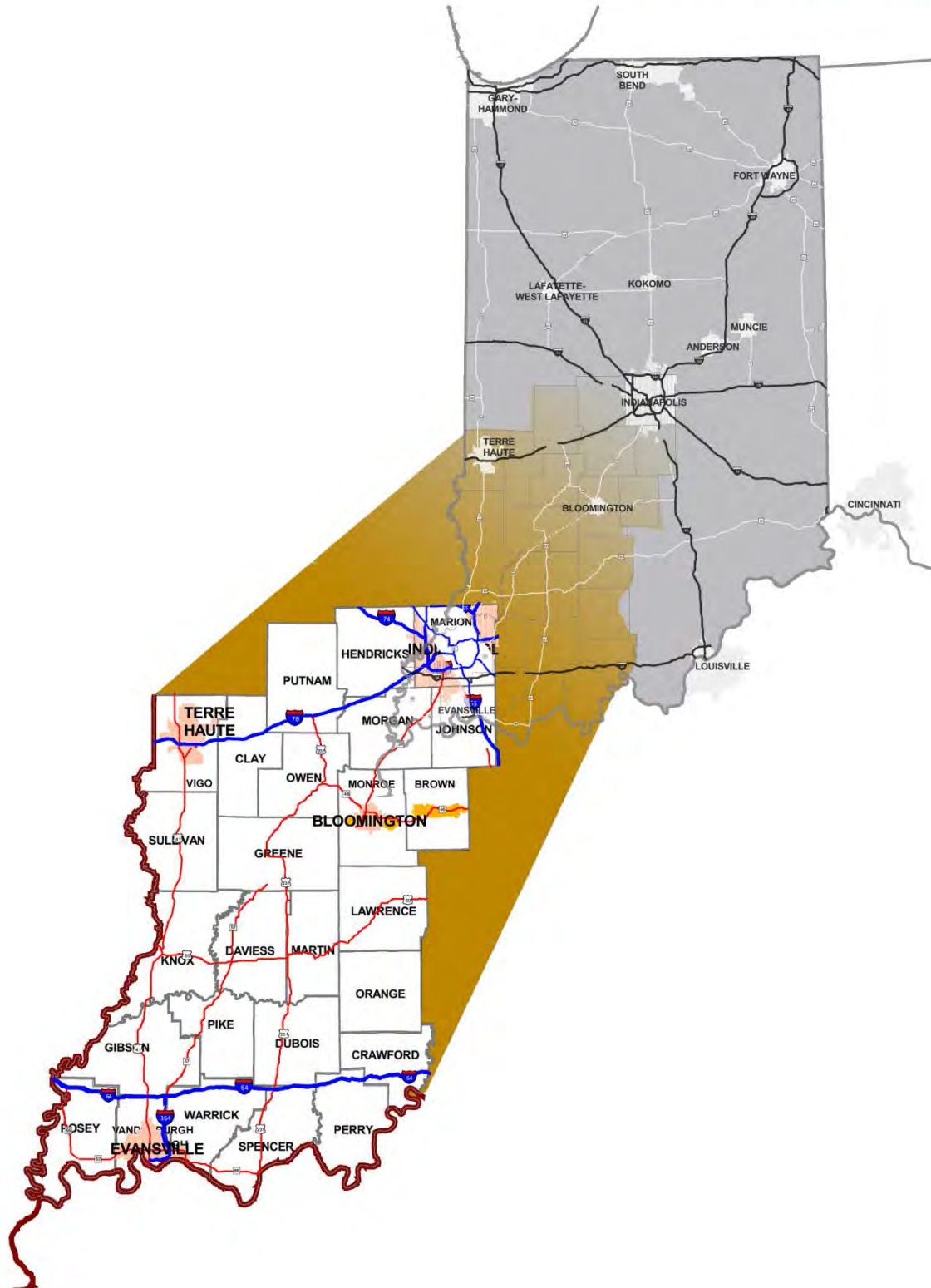


Figure 2.1 – Tier 1 Study Area

I-69 EVANSVILLE TO INDIANAPOLIS TIER 2 STUDIES

Section 6 – Figures

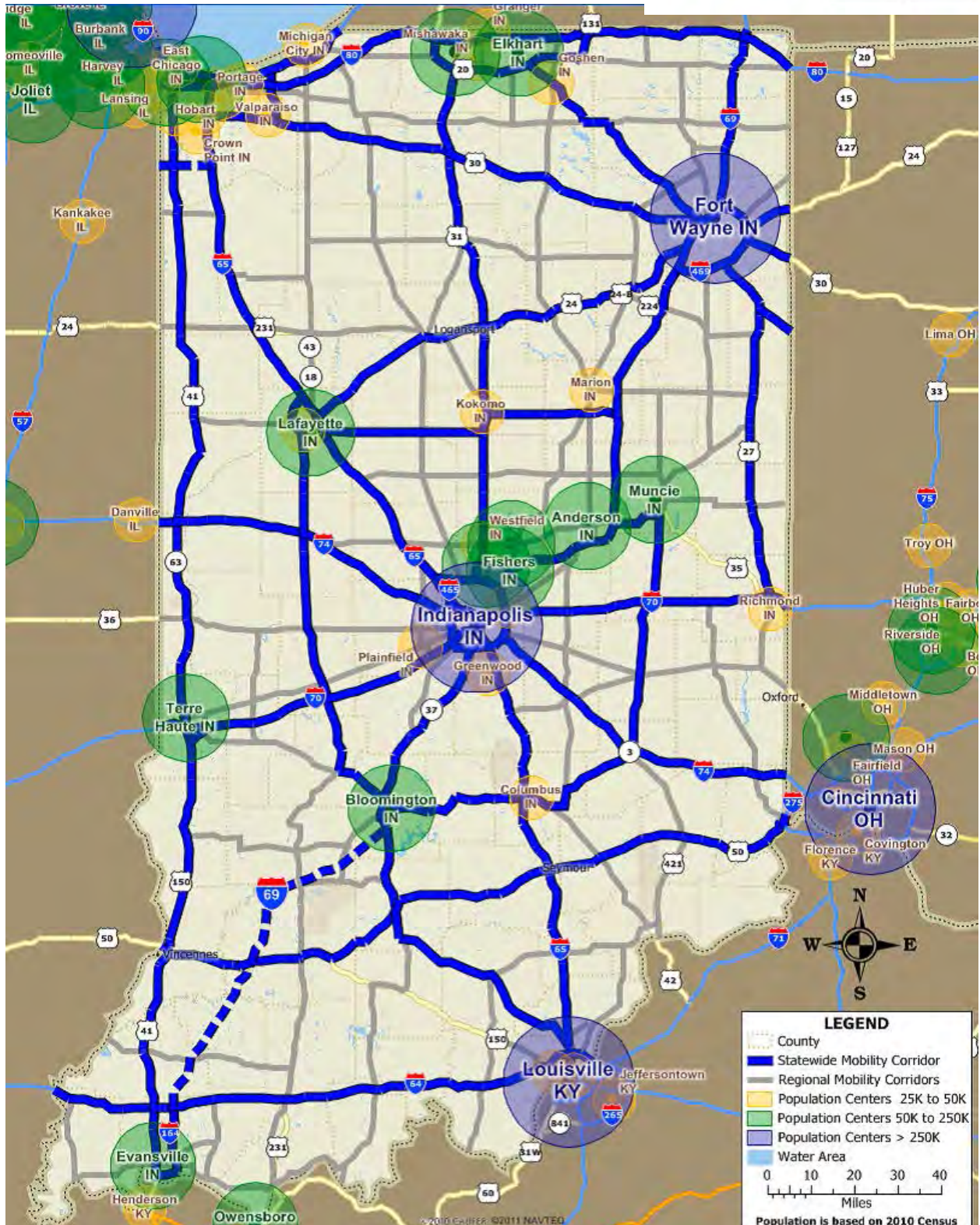


Figure 2.2 – Statewide Mobility Corridors

I-69 EVANSVILLE TO INDIANAPOLIS TIER 2 STUDIES

Section 6 – Figures

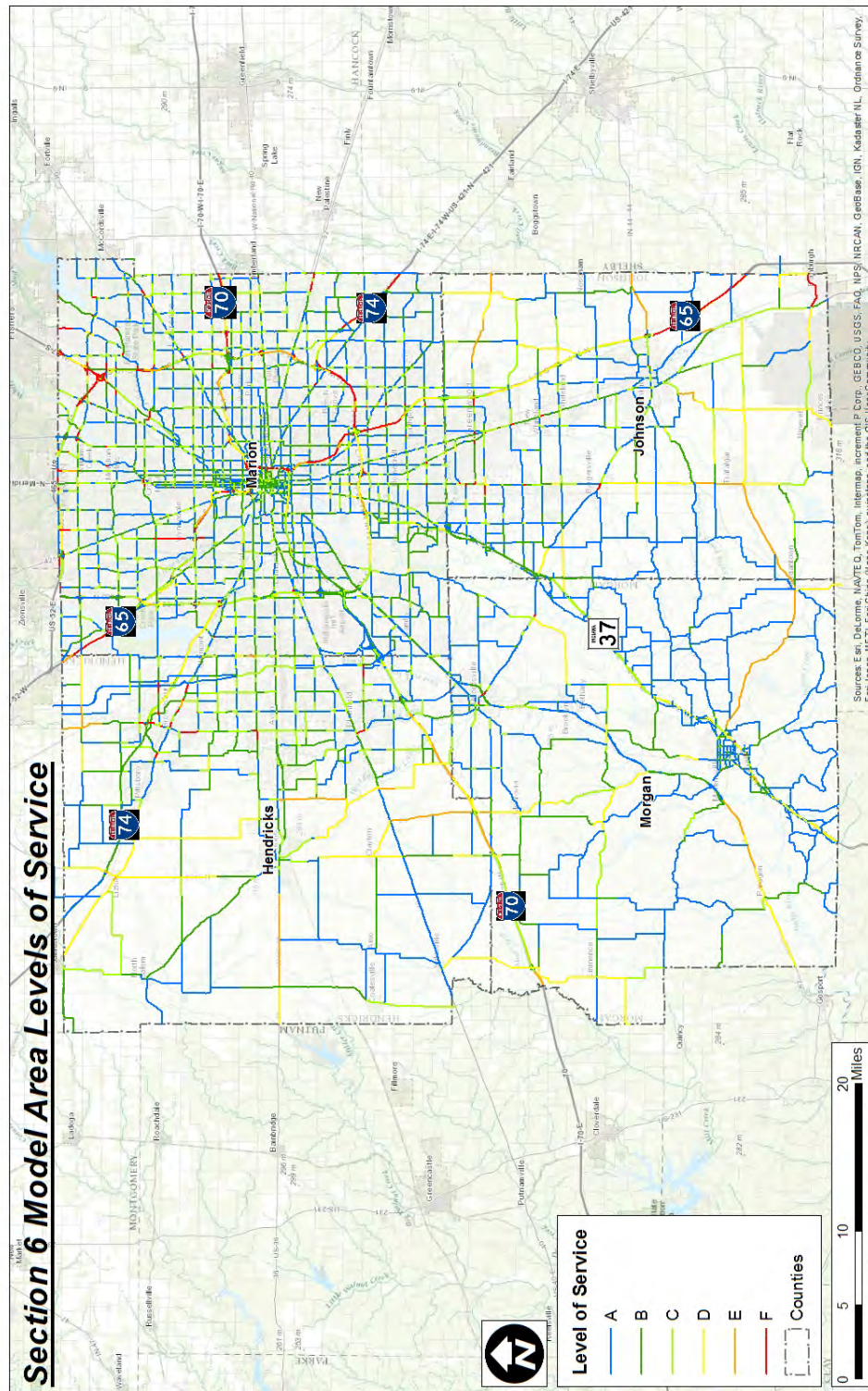


Figure 2-3 – 2045 E + C LOS, Section 6 Study Area



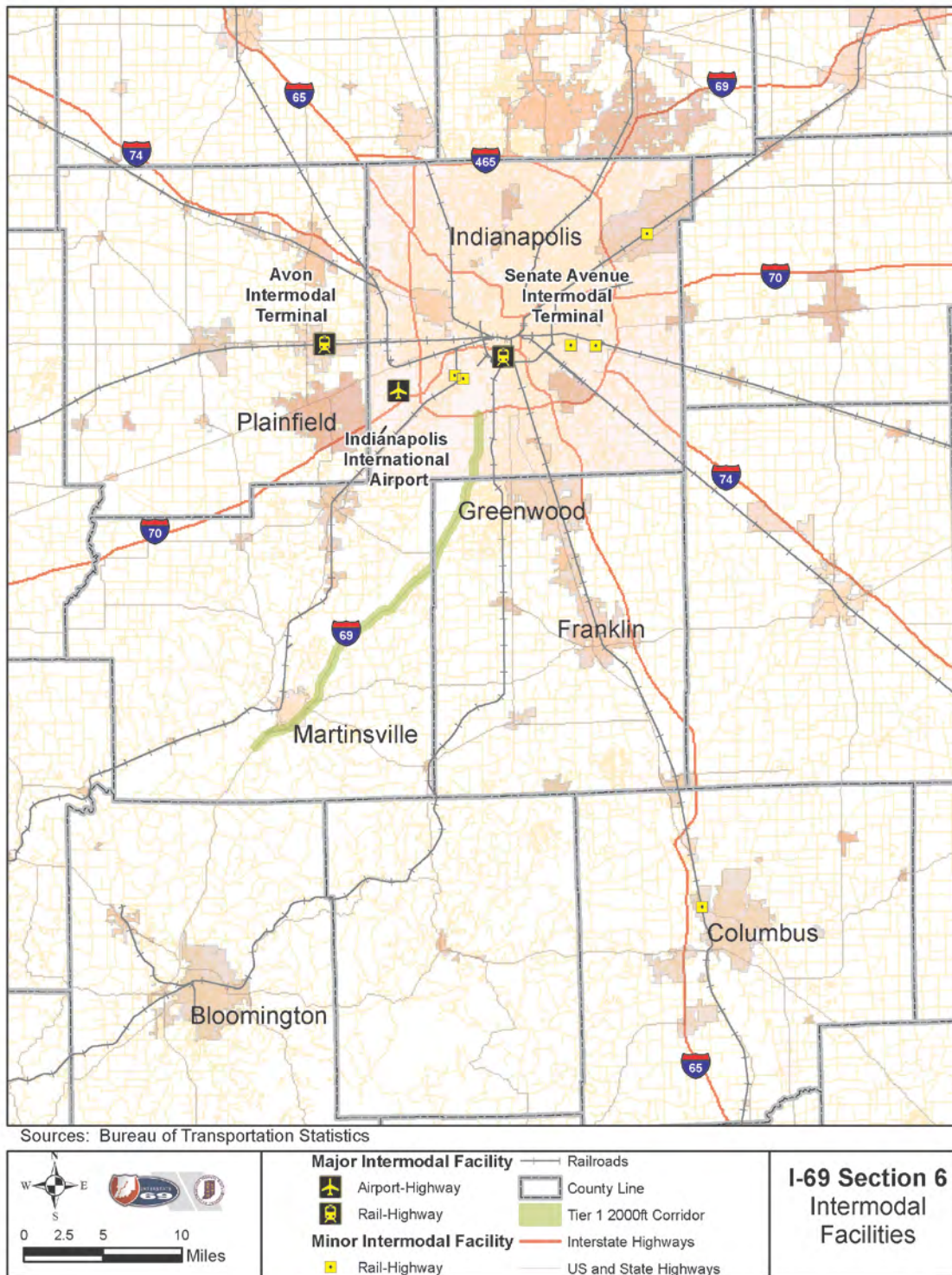


Figure 2-5 – Intermodal Facilities

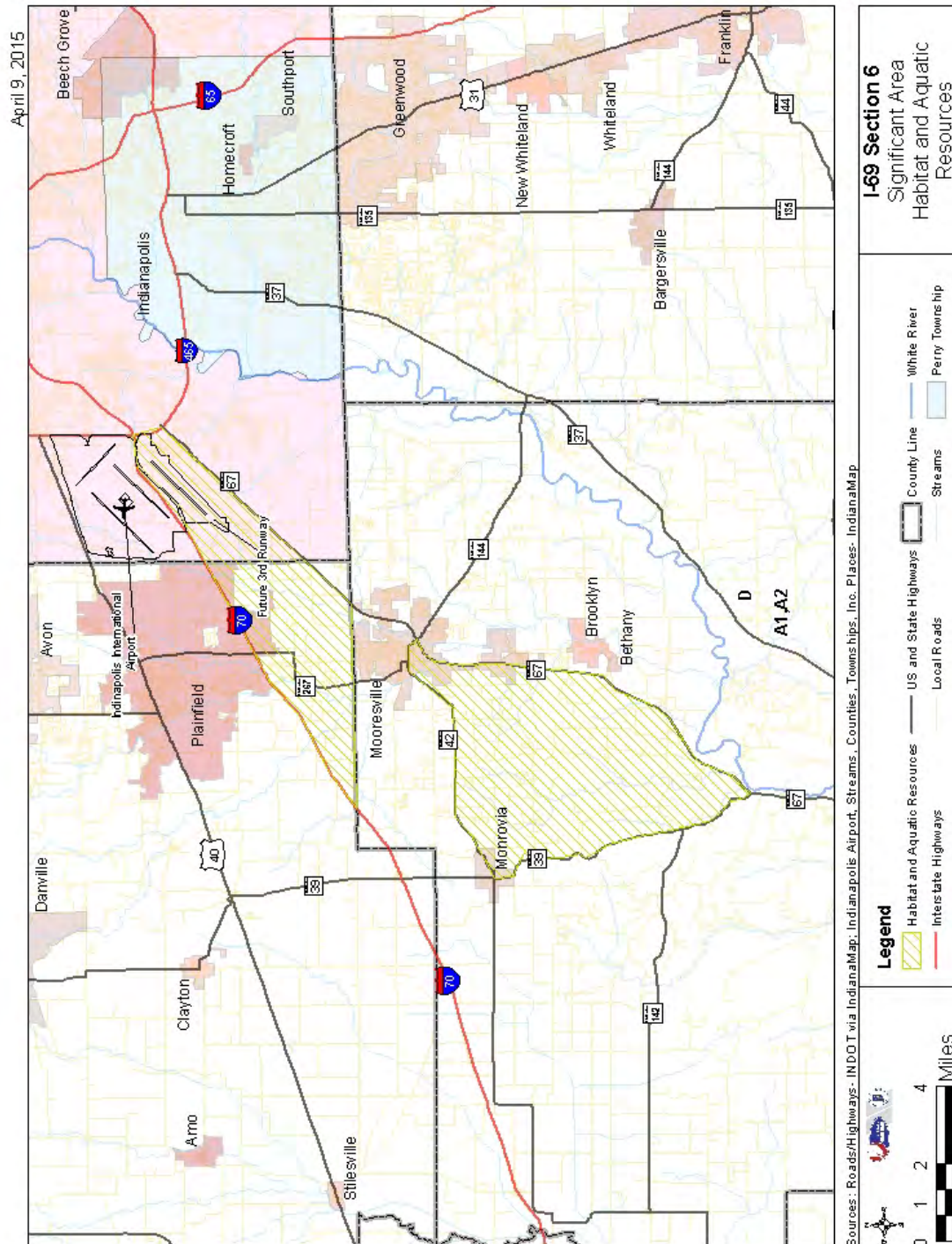


Figure 2-6 – Significant Areas for Habitat and Aquatic Resources

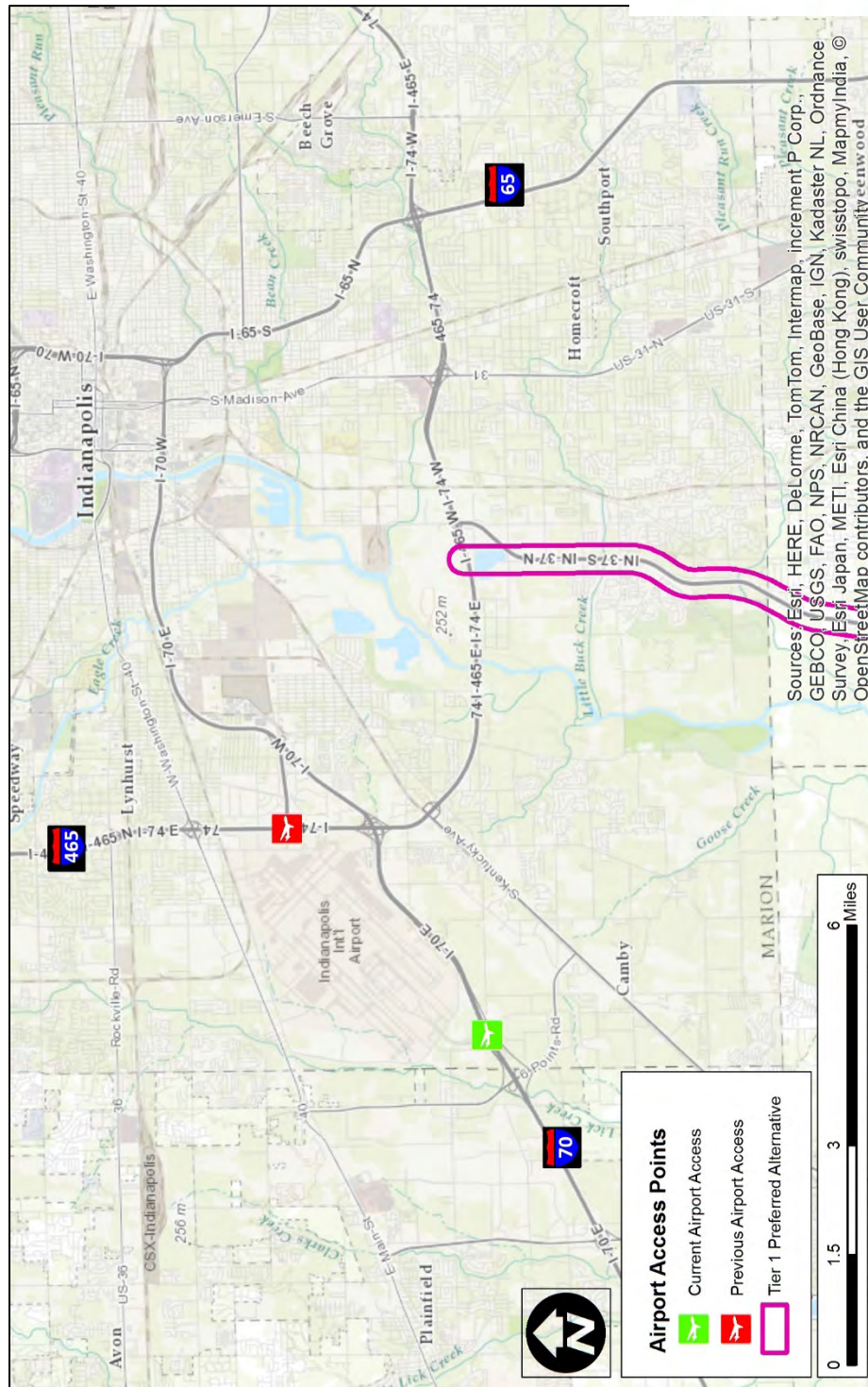


Figure 2-7 – Airport Access Locations, Marion County

I-69 EVANSVILLE TO INDIANAPOLIS TIER 2 STUDIES

Section 6 – Figures

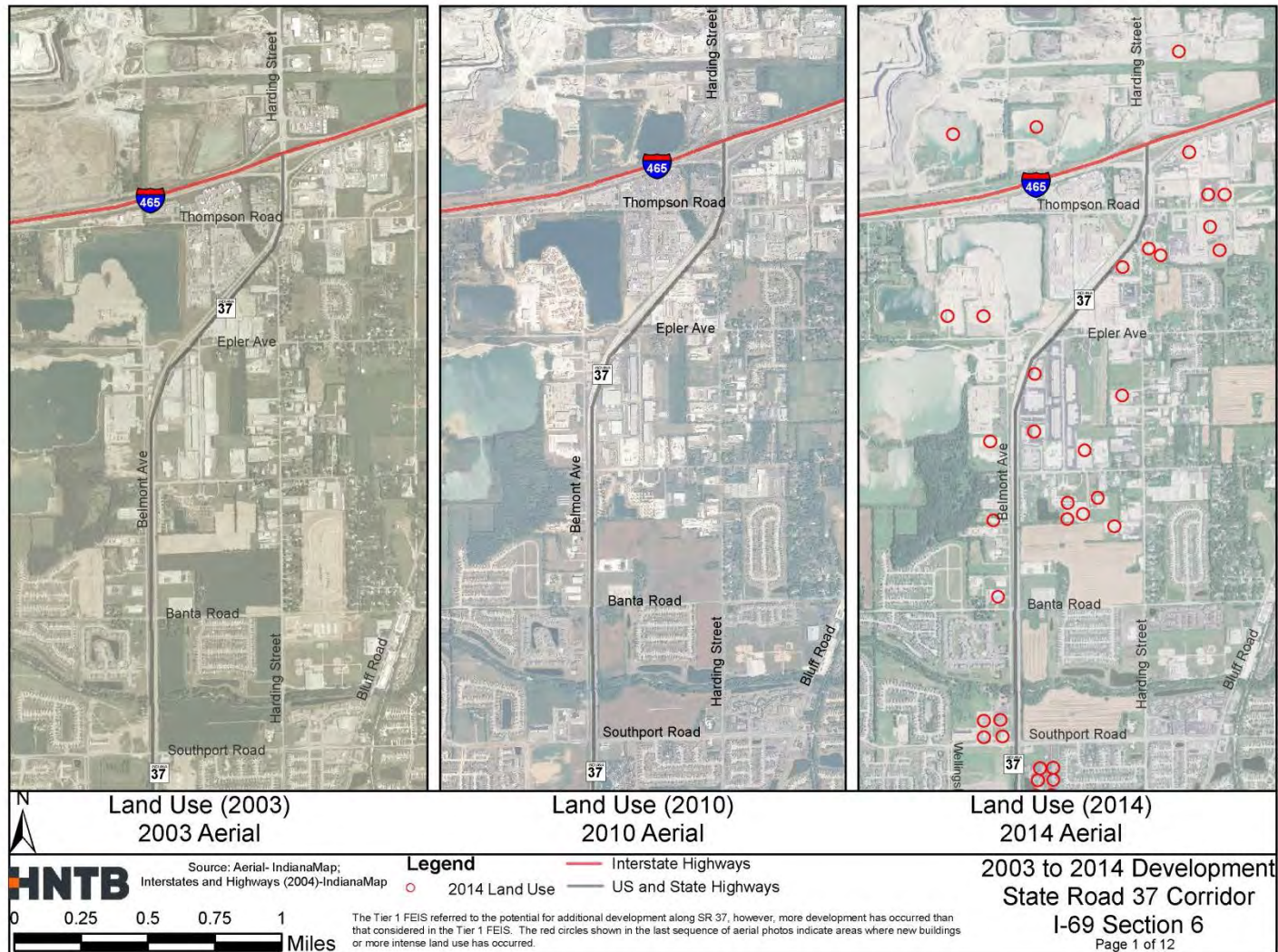


Figure 2-8 – Changes in Land Use along SR 37

I-69 EVANSVILLE TO INDIANAPOLIS TIER 2 STUDIES

Section 6 – Figures

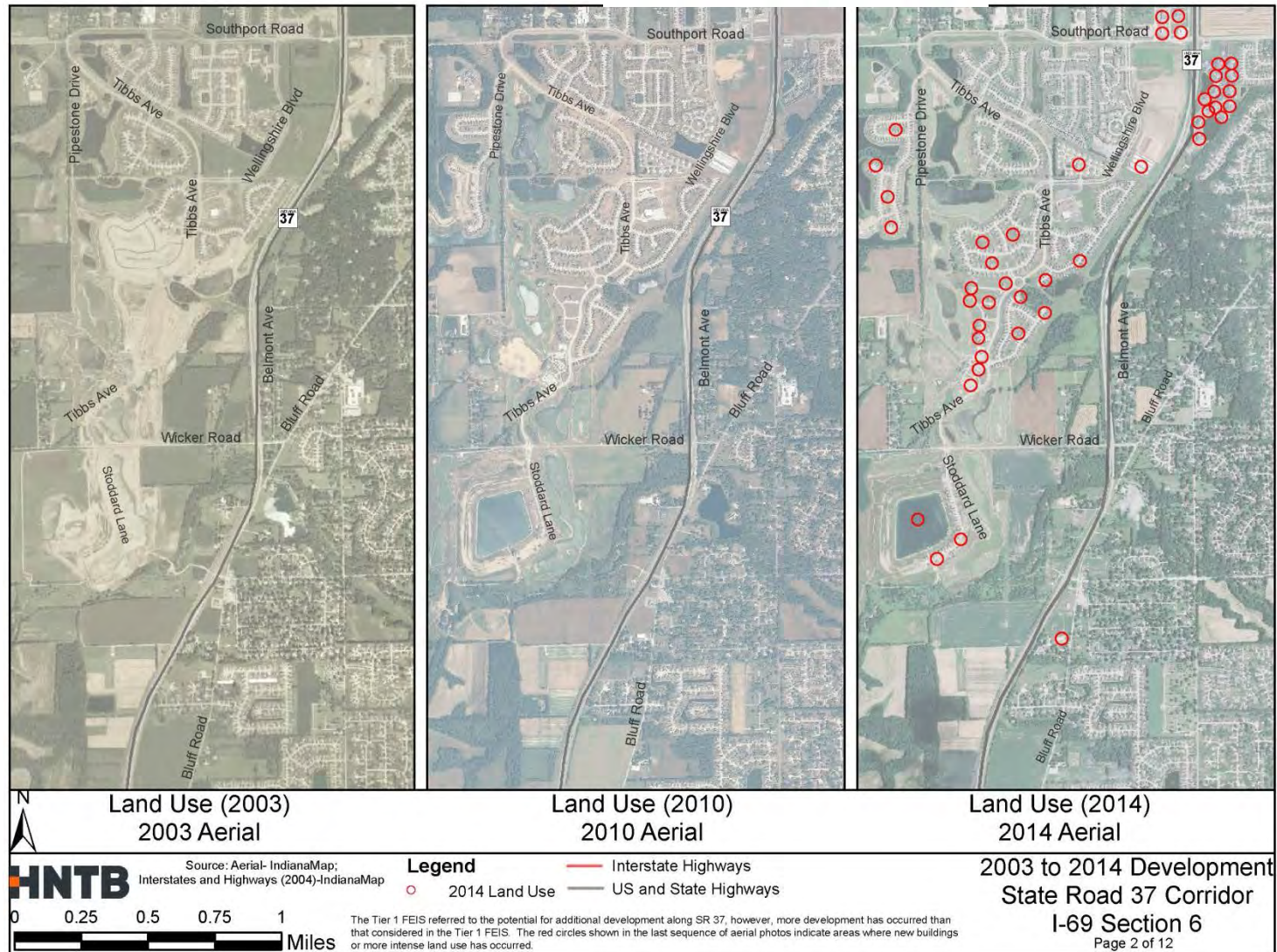


Figure 2-9 – Changes in Land Use along SR 37

I-69 EVANSVILLE TO INDIANAPOLIS TIER 2 STUDIES

Section 6 – Figures

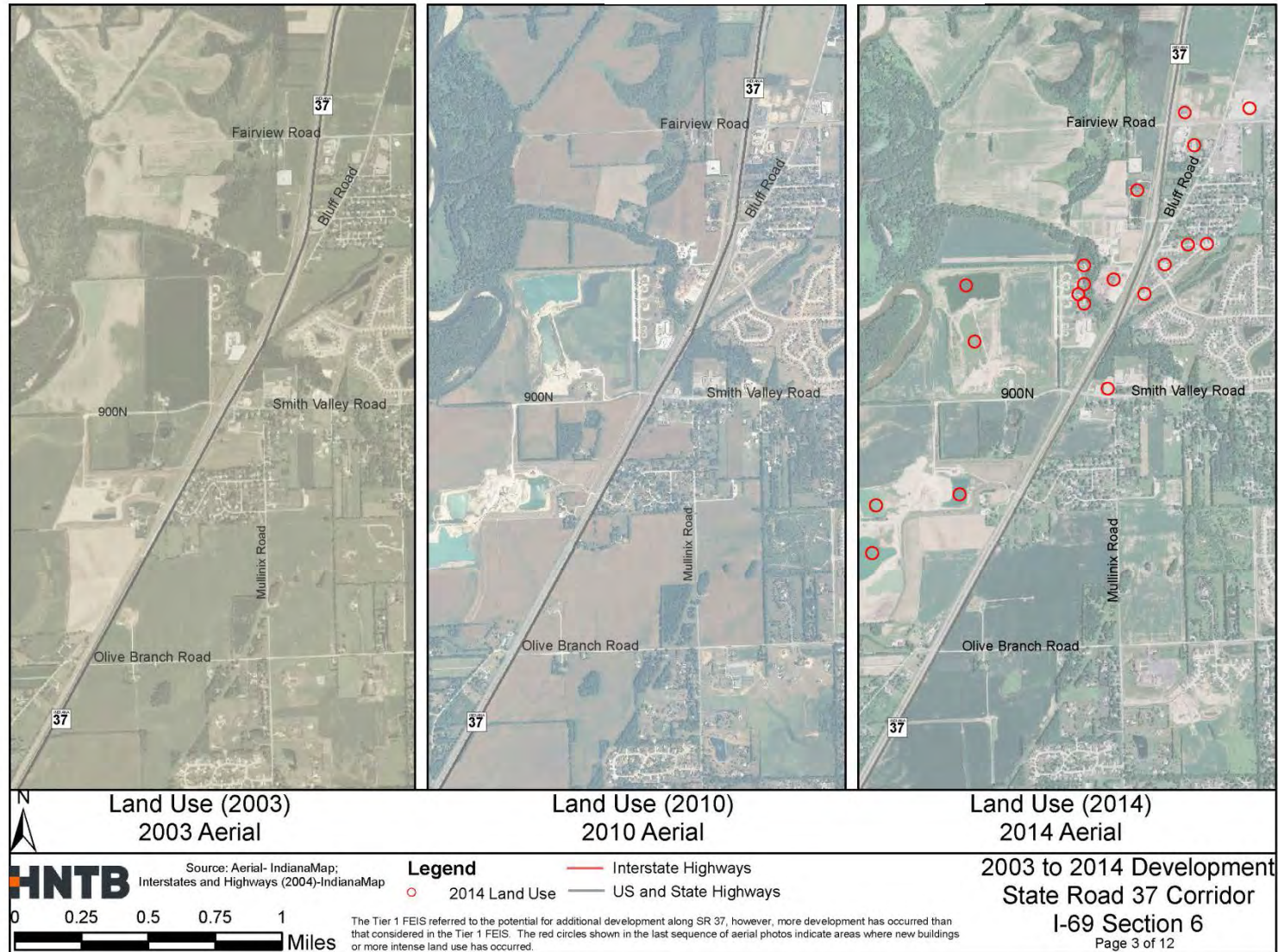


Figure 2-10 – Changes in Land Use along SR 37

I-69 EVANSVILLE TO INDIANAPOLIS TIER 2 STUDIES

Section 6 – Figures

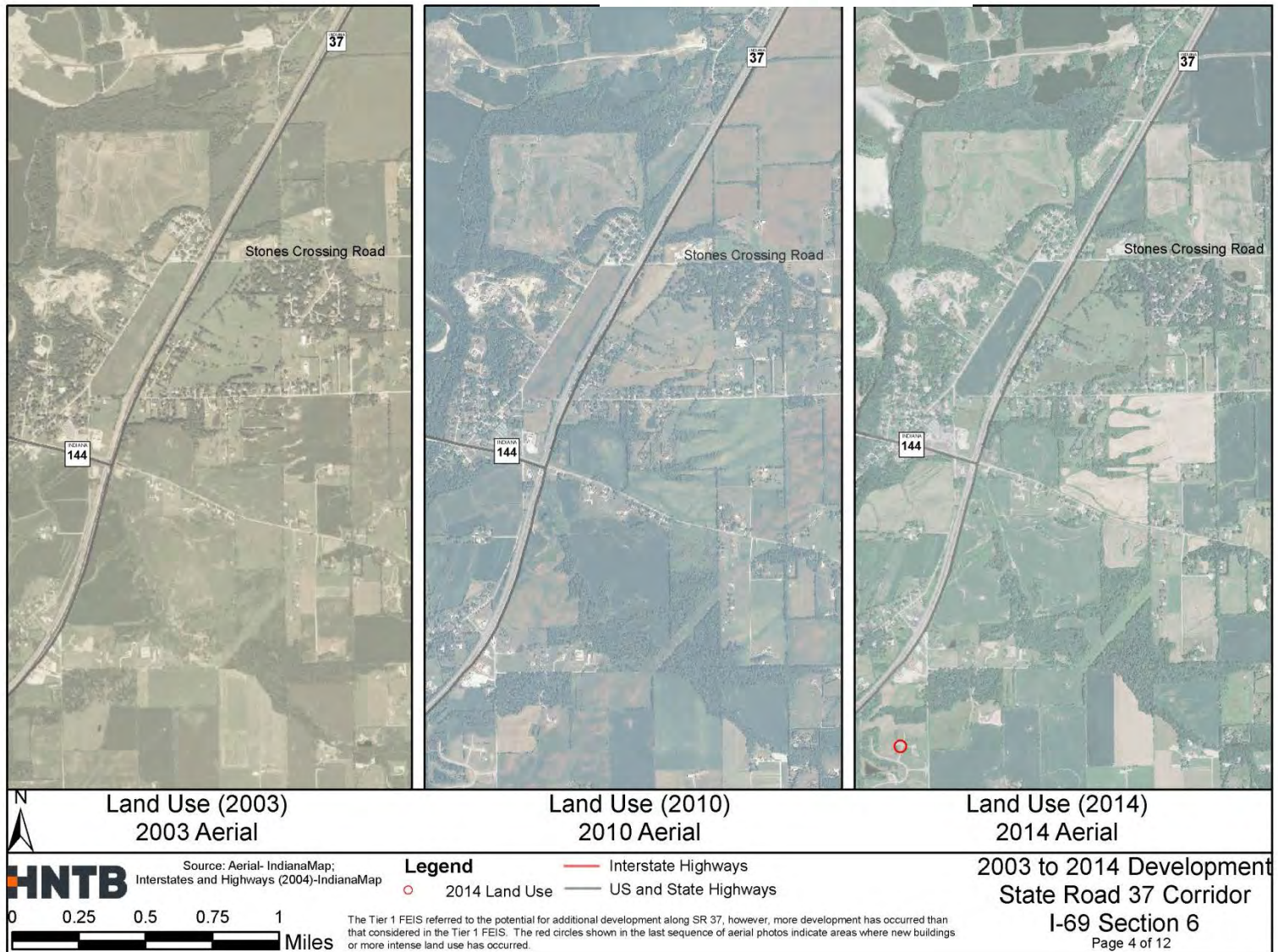


Figure 2-11 – Changes in Land Use along SR 37

I-69 EVANSVILLE TO INDIANAPOLIS TIER 2 STUDIES

Section 6 – Figures

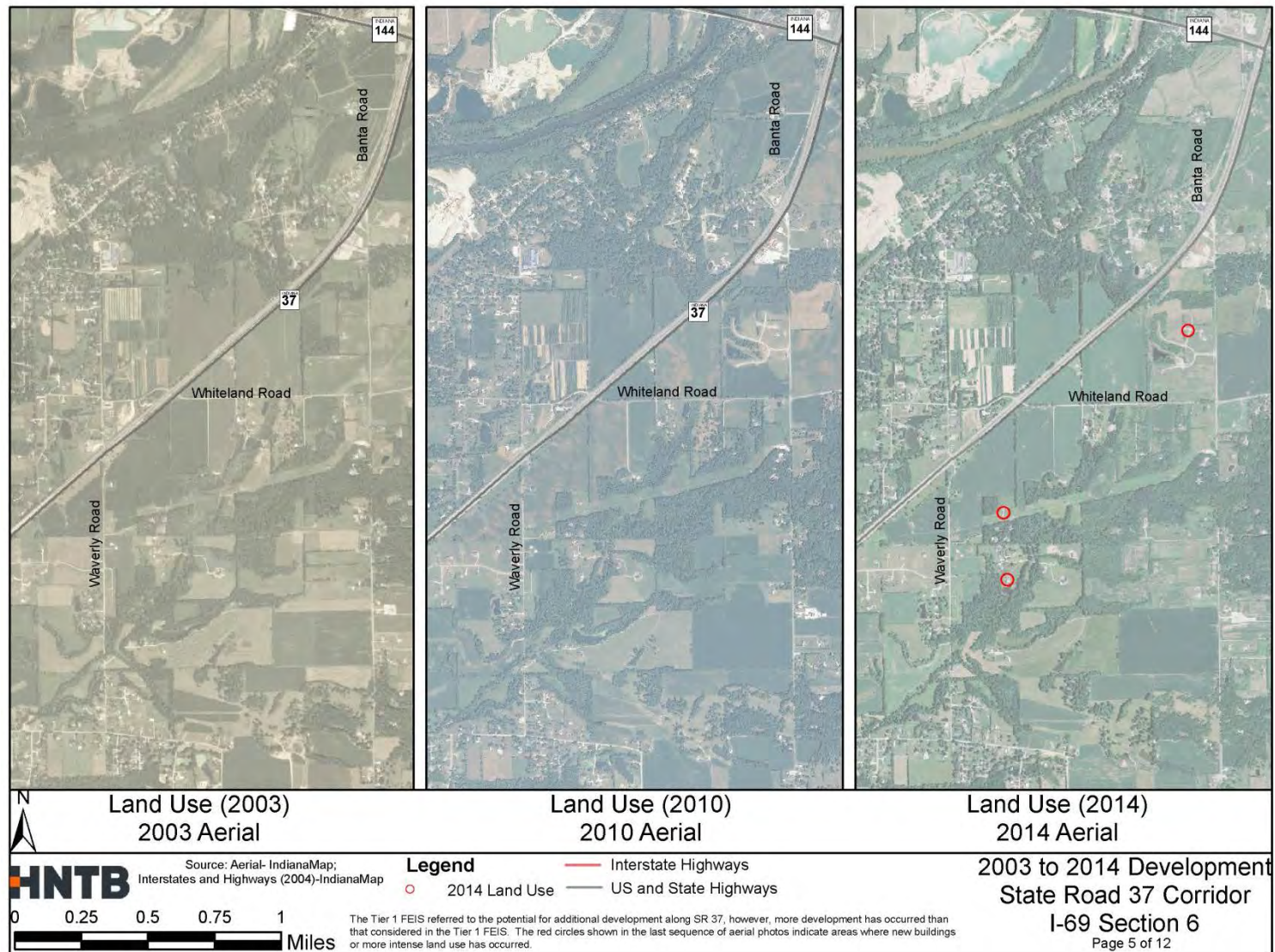


Figure 2-12 – Changes in Land Use along SR 37

I-69 EVANSVILLE TO INDIANAPOLIS TIER 2 STUDIES

Section 6 – Figures

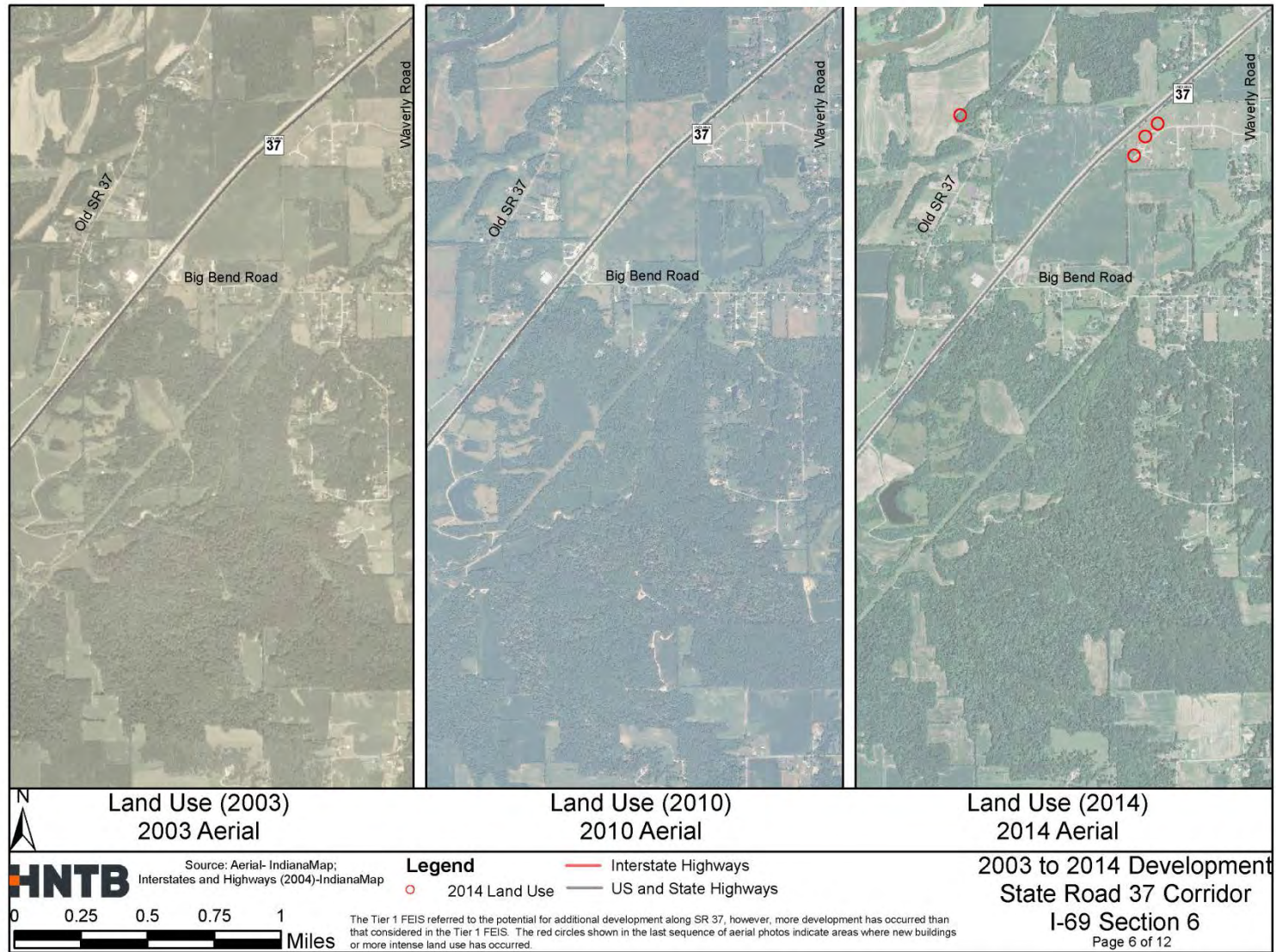


Figure 2-13 – Changes in Land Use along SR 37

I-69 EVANSVILLE TO INDIANAPOLIS TIER 2 STUDIES

Section 6 – Figures

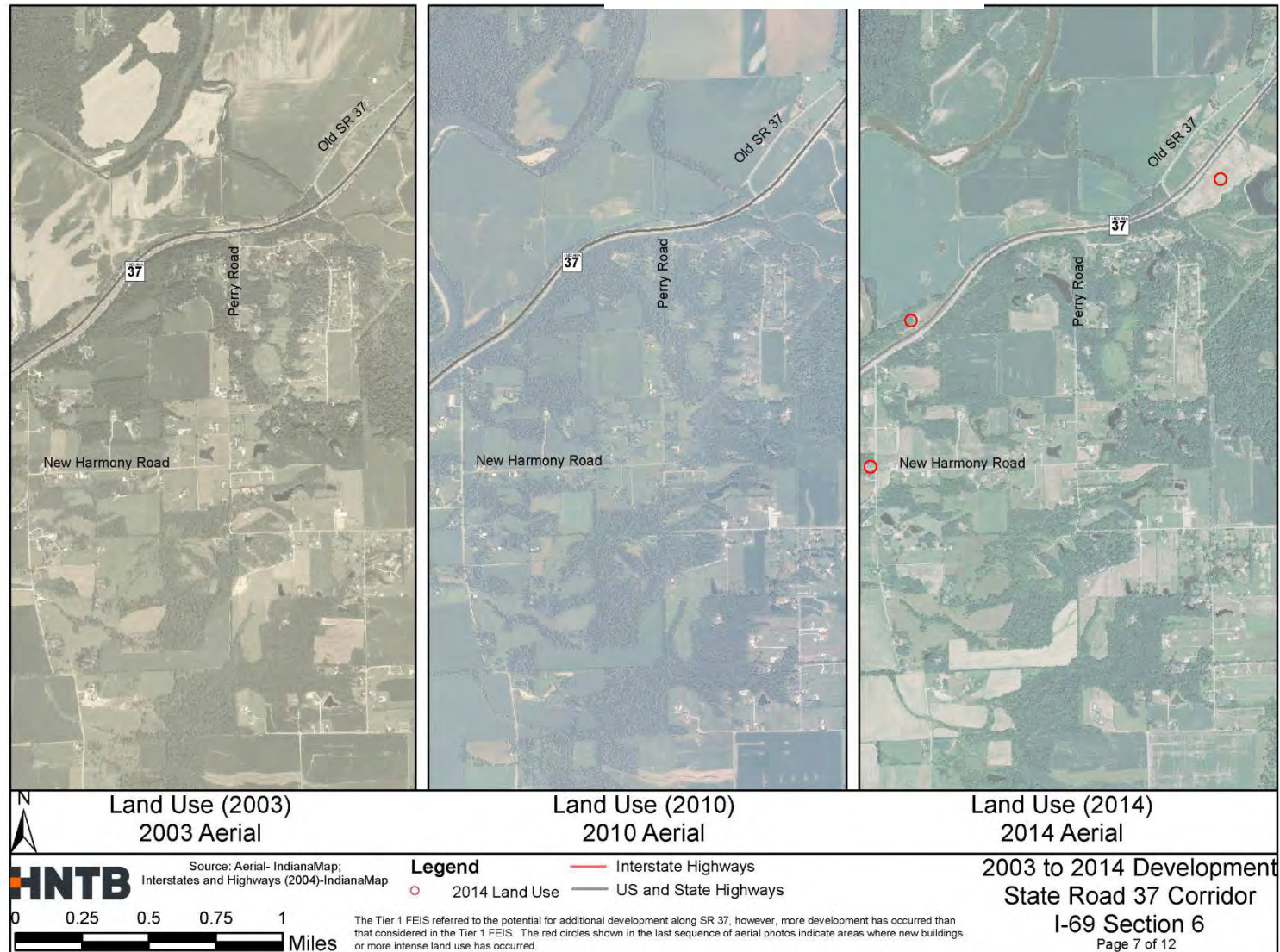


Figure 2-14 – Changes in Land Use along SR 37

I-69 EVANSVILLE TO INDIANAPOLIS TIER 2 STUDIES

Section 6 – Figures

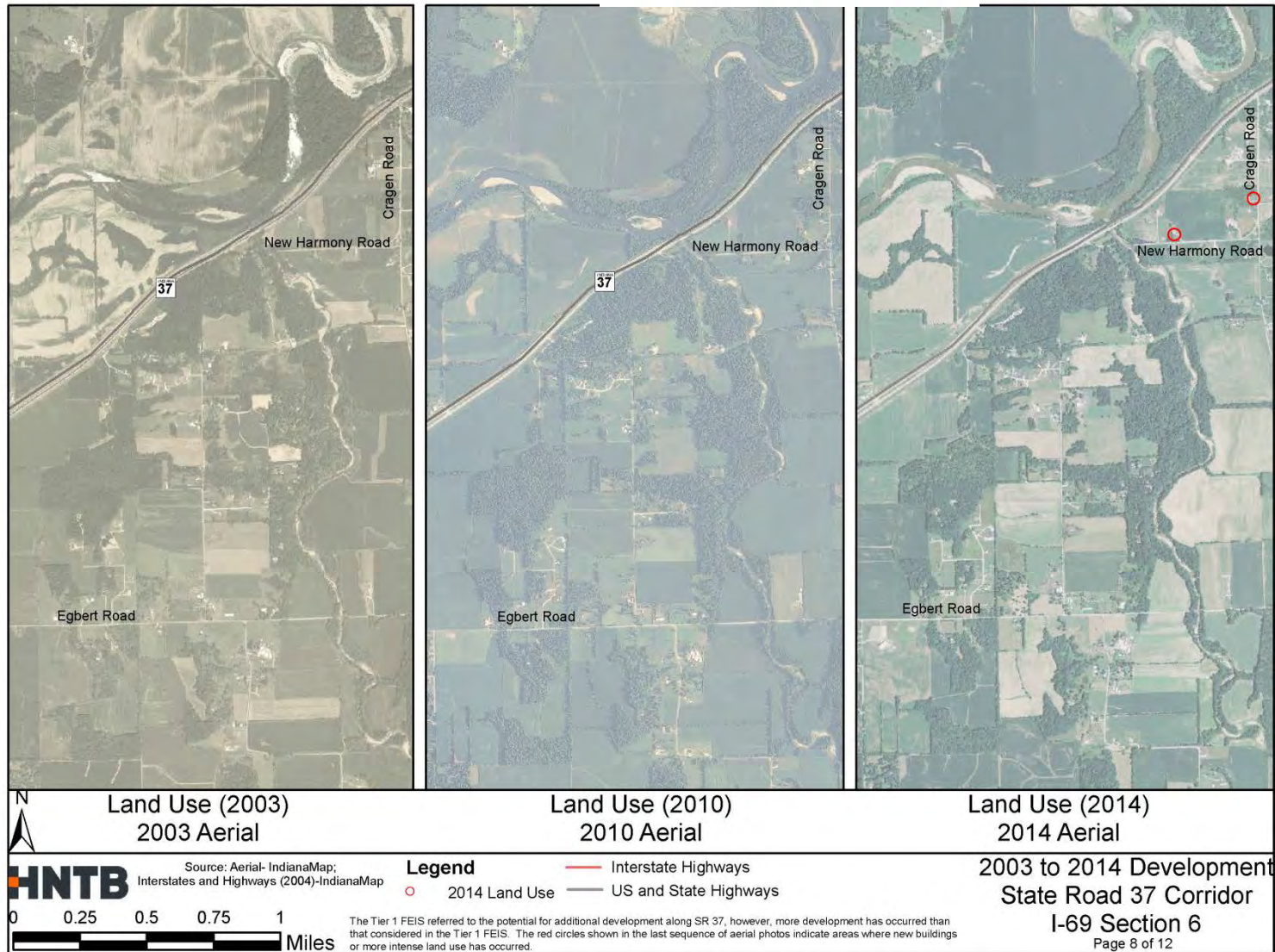


Figure 2-15 – Changes in Land Use along SR 37

I-69 EVANSVILLE TO INDIANAPOLIS TIER 2 STUDIES

Section 6 – Figures

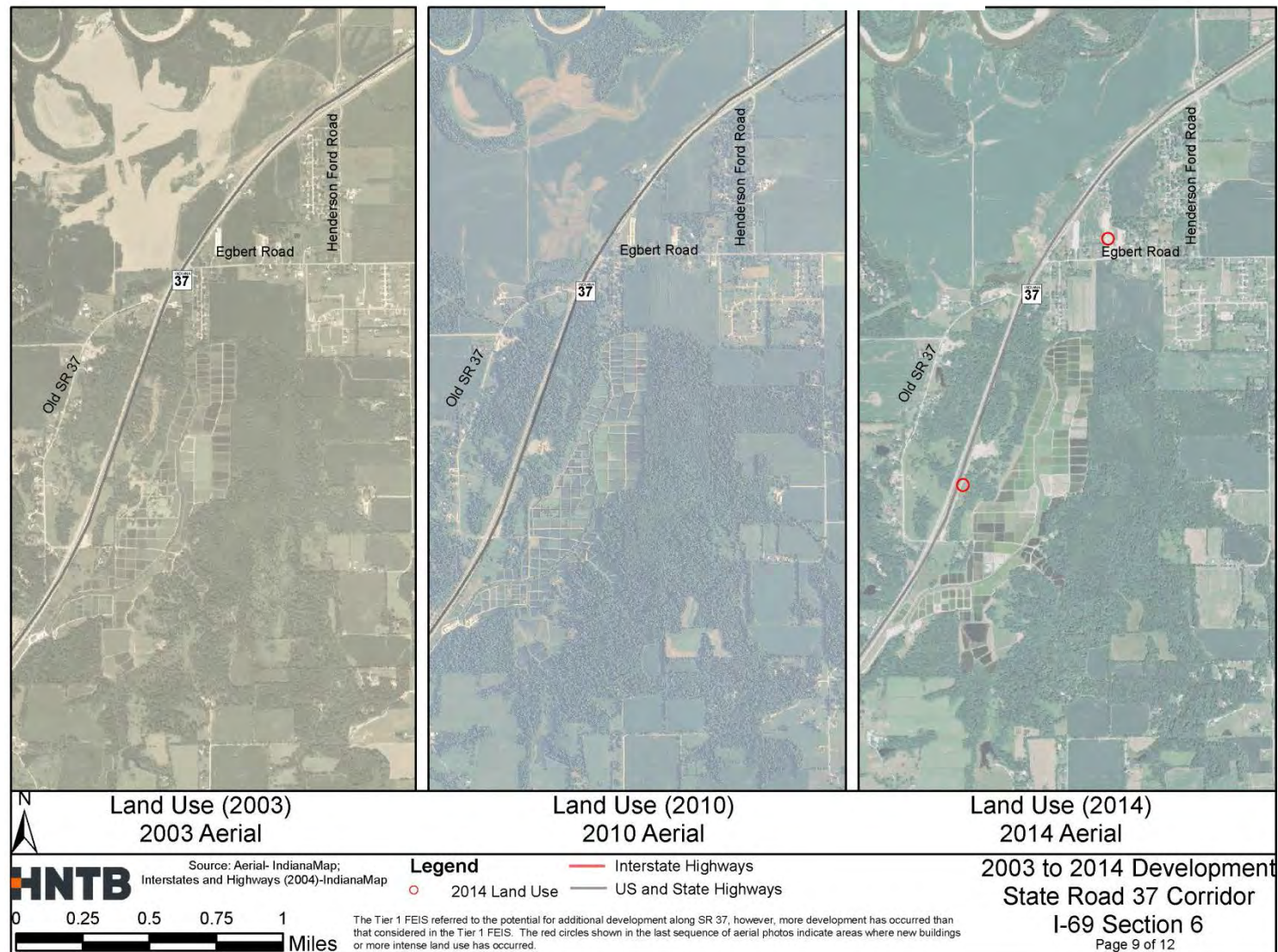


Figure 2-16 – Changes in Land Use along SR 37

I-69 EVANSVILLE TO INDIANAPOLIS TIER 2 STUDIES

Section 6 – Figures

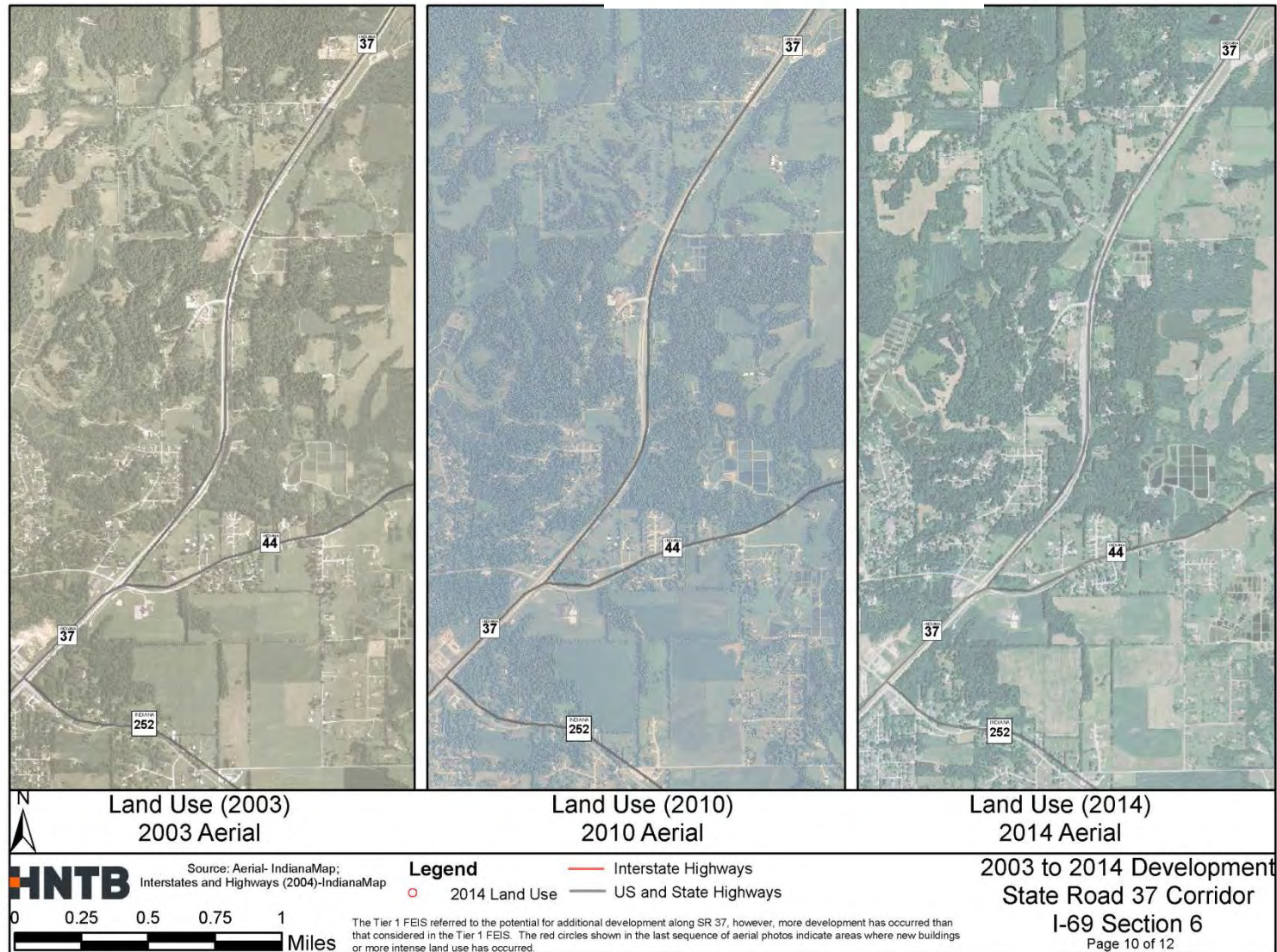


Figure 2-17 – Changes in Land Use along SR 37

I-69 EVANSVILLE TO INDIANAPOLIS TIER 2 STUDIES

Section 6 – Figures

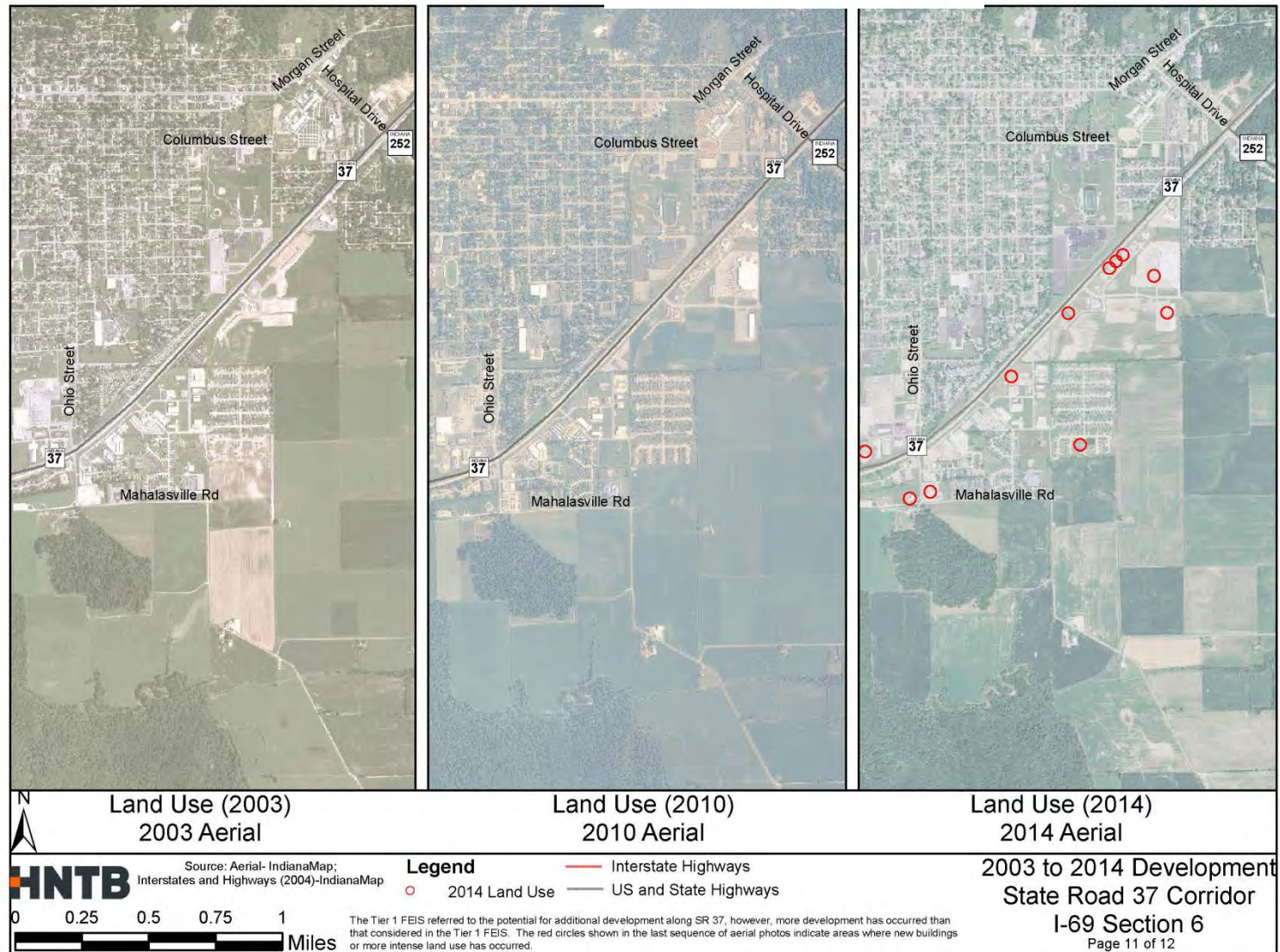


Figure 2-18 – Changes in Land Use along SR 37

I-69 EVANSVILLE TO INDIANAPOLIS TIER 2 STUDIES

Section 6 – Figures

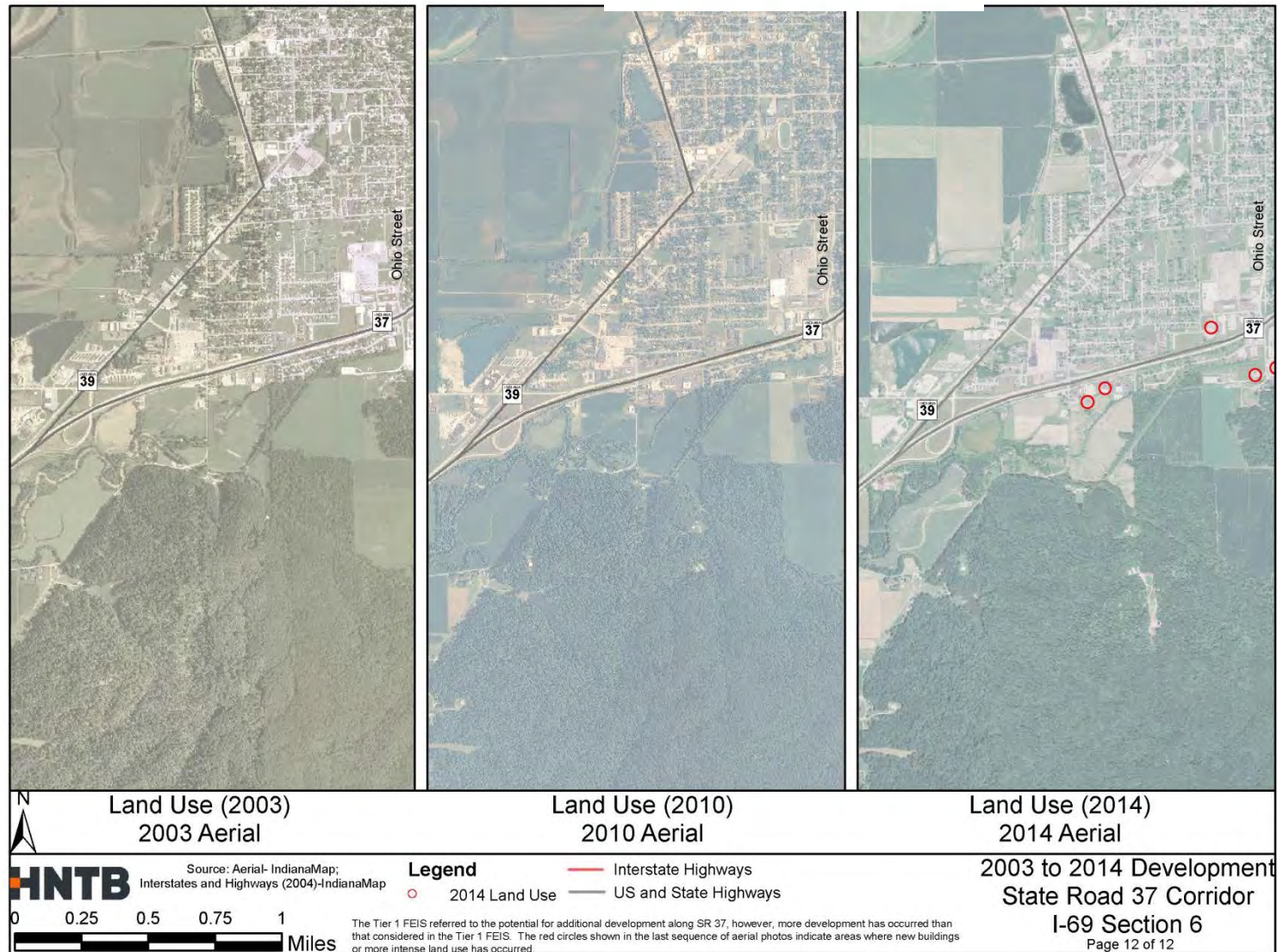


Figure 2-19 – Changes in Land Use along SR 37



APPENDIX C

Purpose and Need Appendix

Resource Agency Comments



I-69 Section 6 Resource Agency Scoping Meeting
February 17, 2015, 9 a.m. EST, Indiana Government Center South Conference Room B

Initial	Name	Title	Organization	Address	Address2	City, State ZIP	E-mail	Phone No.
KW	Mr. Kenneth Westlake	Chief of NEPA Implementation Section	US Environmental Protection Agency, Region 5	77 West Jackson Boulevard	Mail Code: E-19J	Chicago, IL 60604-3590	Westlake.Kenneth@epamail.epa.gov	312-884-2910
VL	Ms. Virginia Laszewski	NEPA Implementation Section	US Environmental Protection Agency, Region 5	77 West Jackson Boulevard	Mail Code: E-19J	Chicago, IL 60604-3590	Laszewski.Virginia@epamail.epa.gov	312-884-7501
	Mr. Willie R. Taylor	Director	U.S. Department of Interior, Office of Environmental Policy and Compliance	1849 C Street, NW MS 2342		Washington, DC 20240		
SP	Mr. Scott Pruitt	US Fish & Wildlife Service, Field Supervisor	U.S. Department of Interior, Bloomington Field Office	620 South Walker Street		Bloomington, IN 47403-2121	scott_pruitt@fws.gov	
PM	Ms. Robin McWilliams-Munson	US Fish & Wildlife Service	U.S. Department of Interior, Bloomington Field Office	620 South Walker Street		Bloomington, IN 47403-2121	robin_mcwilliams@fws.gov	
	Col. Christopher Beck	Commander	U.S. Army Corps of Engineers, Louisville District	Romano Mazzoli Federal Building	600 Dr. Martin Luther King, Jr. Place	Louisville, KY 40202		
	Mr. Stephen Durrett	Deputy District Engineer	U.S. Army Corps of Engineers, Louisville District	Romano Mazzoli Federal Building	600 Dr. Martin Luther King, Jr. Place	Louisville, KY 40202		
	Mr. Greg McKay	Regulatory Chief, North Section	U.S. Army Corps of Engineers, Louisville District		P.O. Box 59	Louisville, KY 40101-0059	Gregory.A.McKay@usace.army.mil	
DS	Ms. Deborah Snyder		U.S. Army Corps of Engineers	Indianapolis Regulatory Office	8902 Otis Avenue, Suite S106B	Indianapolis, IN 46216	Deborah.D.Snyder@usace.army.mil	
RB	Mr. Randy Braun	Section Chief	Indiana Department of Environmental Management, Office of Water Quality	100 North Senate Avenue	Room IGCN 1255	Indianapolis, IN 46204	RBRAUN@idem.IN.gov	
MC	Ms. Martha Clark Mettler	Deputy Assistant Commissioner	Indiana Department of Environmental Management	100 North Senate Avenue	Room IGCN 1255	Indianapolis, IN 46204	MCLARK@idem.IN.gov	
JWR	Mr. Jason Randolph		Indiana Department of Environmental Management, Office of Water Quality	100 North Senate Avenue	Room IGCN 1255	Indianapolis, IN 46204	JRANDOLP@idem.IN.gov	
JHS	Mr. Jim Sullivan		Indiana Department of Environmental Management, Ground Water Section	100 North Senate Avenue	Room IGCN 1201	Indianapolis, IN 46204	JSULLIVA@idem.IN.gov	
	Mr. John Davis	Deputy Director	Indiana Department of Natural Resources	402 West Washington Street	Room W256	Indianapolis, IN 46204		
	Mr. Chris Smith	Deputy Director	Indiana Department of Natural Resources	402 West Washington Street	Room W256	Indianapolis, IN 46204	csmith@dnr.in.gov	
	Ms. Christie Stanifer	Environmental Coordinator	Indiana Department of Natural Resources, Division of Fish & Wildlife	402 West Washington Street	Room W264	Indianapolis, IN 46204	cstanifer@dnr.IN.gov	
MB	Mr. Matt Buffington	Environmental Supervisor	Indiana Department of Natural Resources, Division of Fish & Wildlife	402 West Washington Street	Room W264	Indianapolis, IN 46204	mbuffington@dnr.IN.gov	
MZ	Mr. Mitchell Zoll	Deputy State Historic Preservation Officer	Indiana Department of Natural Resources, Division of Historic Preservation & Archaeology	402 West Washington Street	Room W274	Indianapolis, IN 46204	mzoll@dnr.IN.gov	
JHC	Mr. John Carr	Team Leader, Historic Structures Reviewers	Indiana Department of Natural Resources, Division of Historic Preservation & Archaeology	402 West Washington Street	Room W274	Indianapolis, IN 46204	jcarr@dnr.IN.gov	
	Ms. Patty Trapp	Acting Regional Director	National Park Service, Midwest Regional Office	601 Riverfront Drive		Omaha, NE 68102-4226		
	Ms. Jane Hardisty	State Conservationist	USDA - NRCS	Indiana State Office	6013 Lakeside Boulevard	Indianapolis, IN 46278-2933	jane.hardisty@in.usda.gov	
	Mr. Bruno Pigott	Assistant Commissioner	Indiana Department of Environmental Management, Office of Water Quality	100 North Senate Avenue	IGCN Room 1255	Indianapolis, IN 46204	BPIGOTT@idem.in.gov	
	Mr. Cameron F. Clark	Director	Indiana Department of Natural Resources	402 West Washington Street	Room W256	Indianapolis, IN 46204	cclark@dnr.in.gov	
	Ms. Carol Borgstrom	Director	U.S. Department of Energy, Office of NEPA Policy & Compliance, (GC-54)	1000 Independence Avenue, SW		Washington, DC 20585-0103		
	Mr. John Hall	Field Office Director	U.S. Department of Housing & Urban Dev. Indianapolis Field Office	Minton-Capehart Federal Building	575 North Pennsylvania Street, Room 655	Indianapolis, IN 46204		
	Mr. Barry Cooper	Regional Administrator	Federal Aviation Administration, Great Lakes Region	O'Hare Lake Office Center	2300 East Devon Avenue	Des Plaines, IL 60018		
JS	Mr. John Steinmetz	Director	Indiana Geological Survey	611 North Walnut Grove		Bloomington, IN 47405	isteinm@indiana.edu	
	Ms. Nancy Hasenmueller		Indiana Geological Society, Environmental Geology Section	611 North Walnut Grove		Bloomington, IN 47405	hasenmue@indiana.edu	
	Mr. James Kinder	Chief Airport Inspector	Indiana Department of Transportation, Department of Aviation	100 North Senate Avenue	Room N955, IGC North	Indianapolis, IN 46204	jkinder@indot.in.gov	
	Sir or Madam	Regional Environmental Coordinator	National Park Service, Midwest Region Office	601 Riverfront Drive		Omaha, NE 68102		
	Kia Gillette	Env. Manager	Lochner Group	3502 Woodview Trail	Suite 150	Indianapolis, IN	kgillette@lochner.com	317-222-3920
	Chris Meador	Env. Scientist	HNTB	111 Madison + Clark	Suite 1200	Indianapolis, IN	cmeador@hntb.com	317-434-4082
	Sam Bales	Proj. Mgr.	INDOT					
	Ron Bales	Sr. Env. Mgr.	INDOT	100 N. Senate Ave	Room 642	Indianapolis, IN	rbales@indot.in.gov	
	Marlene Mathas	Haz Mat	INDOT	100 N. Senate Ave	Room 642	Indianapolis, IN	mmathas@indot.in.gov	317-232-5113
	Chad Slider	Asst. Dir. Env. Review	DNR - DHPA	402 W. Wash	Room W274	Indianapolis, IN	cslider@dnr.in.gov	317-234-5366



Indiana Department of Natural Resources

Michael R. Pence, Governor
Cameron F. Clark, Director

Division of Historic Preservation & Archaeology-402 W. Washington Street, W274-Indianapolis, IN 46204-2739
Phone 317-232-1646-Fax 317-232-0693-dhpa@dnr.IN.gov



March 12, 2015

Richard J. Marquis
Division Administrator
Federal Highway Administration, Indiana Division
575 North Pennsylvania Street, Room 254
Indianapolis, Indiana 46204

Federal Agency: Federal Highway Administration ("FHWA")

Re: I-69 Tier 2 Studies for Section 6 from Martinsville to Indianapolis Resource Agency Scoping Meeting (HDA-IN; Des. No. 0300382; DHPA No. 4615)

Dear Mr. Marquis:

Pursuant to Section 106 of the National Historic Preservation Act of 1966, as amended (recently recodified at 54 U.S.C. § 306108), 36 C.F.R. Part 800, and the "Programmatic Agreement Among the Federal Highway Administration, the Indiana Department of Transportation, the Advisory Council on Historic Preservation and the Indiana State Historic Preservation Officer Regarding the Implementation of the Federal Aid Highway Program In the State of Indiana," the staff of the Indiana State Historic Preservation Officer ("Indiana SHPO") has considered the presentation at the February 17, 2015, meeting, supplementary information submitted by the Indiana Department of Transportation ("INDOT") by e-mail on February 26, 2015, and the minutes of the February 17 meeting, which we received by e-mail from INDOT on March 3, 2015, for the aforementioned project in Morgan, Johnson, and Marion counties in Indiana.

We do not have any recommendations for additional Purpose and Need goals.

Although we have some awareness of significant cultural resources within and near the SR 37 corridor as a result of previous studies of this project and others, we do not have any recommendations for alternative alignments.

In our March 10, 2015, letter, we shared comments with FHWA, INDOT, and INDOT's consultants regarding the proposed Section 106 area of potential effects and the methodologies for identification and evaluation of cultural resources. We have no further comments on those issues at this time.

Please direct questions about above-ground properties (such as buildings and structures) to John Carr at (317) 233-1949 or JCarr@dnr.in.gov. Questions about archaeology should be directed to Wade Tharp at (317) 232-1650 or WTharp1@dnr.in.gov.

In all future correspondence regarding the I-69 Tier 2 Studies for Section 6 from Martinsville to Indianapolis (HDA-IN; Des. No. 0300382), please refer to DHPA No. 4615.

Very truly yours,

Mitchell K. Zoll
Deputy State Historic Preservation Officer

MKZ:JLC:WTT:jlc

emc: Michelle Allen, Federal Highway Administration, Indiana Division
Sarah Rubin, Indiana Department of Transportation
Kevin Hetrick, P.E., Indiana Department of Transportation
Laura Hilden, Indiana Department of Transportation
Patrick Carpenter, Indiana Department of Transportation
Mary Kennedy, Indiana Department of Transportation
Shaun Miller, Indiana Department of Transportation
Shirley Clark, Indiana Department of Transportation
William Wiedelman, P.E., HNTB Corporation
Christine Meador, HNTB Corporation
Rich Connolly, HNTB Corporation
Jason DuPont, P.E., Lochmueller Group
Timothy Miller, Lochmueller Group
Kia Gillette, Lochmueller Group
Connie Zeigler, Lochmueller Group
Kyle Boot, Lochmueller Group
Linda Weintraut, Ph.D., Weintraut & Associates, Inc.
Beth McCord, Gray & Pape, Inc.
Mitchell Zoll, Deputy State Historic Preservation Officer, Department of Natural Resources
Chad Slider, Department of Natural Resources
Wade Tharp, Department of Natural Resources
John Carr, Department of Natural Resources



Environmental Unit
Division of Fish and Wildlife
402 W. Washington Street
Room W273
Indianapolis, IN 46204
Phone (317) 232-4080
Fax (317) 232-8150
www.in.gov/dnr/fishwild/

March 17, 2015

Sarah Rubin
Indiana Department of Transportation
100 N. Senate Ave., Room N642
Indianapolis, IN 46204

Re: Comments from Indiana Department of Natural Resources, Division of Fish and Wildlife regarding Section 6 Interstate 69 Scoping

Dear Ms. Rubin:

On February 17, 2015, an agency kick off meeting was held in Indianapolis to discuss Section 6 of Interstate 69. The meeting included an update of potential alternatives and new goals. INDOT issued a request for comments from the attending agencies regarding the current scoping of Section 6.

The Indiana Department of Natural Resources, Division of Fish and Wildlife (DFW) is not opposed to the new potential goals for Section 6. However, some of the issues raised as a reason to re-evaluate Section 6 also applied to Section 5, and the extensive impacts through all the sections thus far call into question why a re-evaluation is now occurring.

The DFW understands that the potential alternatives outside the Tier 2 corridor may or may not move forward into the alternatives analysis. However, there are significant concerns about a major alignment change given the history of this project. During Tier 1, one alternative included using US 41 and Interstate 70. That alternative was not selected yet now there is an interest to possibly use a portion of Interstate 70 in order to avoid a developed area. The DFW is not suggesting a full re-evaluation of Tier 1 but requests a detailed explanation of why using I-70 here is justified when the US 41/I-70 alignment was not chosen previously.

Clearing and construction for the selected corridor currently extends north of Bloomington. This has resulted in significant impacts upon natural resources such as streams, wetlands, large blocks of contiguous woods, and known habitat of the federally endangered Indiana bat. There have also been impacts to homes and businesses throughout all of the sections. The overall impacts so far have been extensive and significant. It is not clear how the current condition of Section 6 is significantly more important to justify avoiding impacts here than what was impacted by building Sections 1-5.

It is incredibly difficult to assess potential impacts with alternatives connecting to I-70 and I-65 as there are no corridors proposed. The key to any proposal is to avoid habitat to the greatest extent possible. Either option would include crossing streams, with the White River having to be crossed again if the I-70 option is selected (the East Fork White River was crossed near Petersburg). West of the White River, roughly within the area bounded by State Route 67 and State Route 42, there is a large area of mostly forested habitat in a highly dissected landscape with numerous streams coming off of relatively steep hillsides. While not equal to Section 4 in terms of intact habitat, this area does possess some similar qualities as Section 4. This entire forest/hill/stream landscape should be completely avoided as there are other alternatives available, including the SR37 corridor. Allowing the destruction of this habitat instead of using existing SR37 appears unreasonable. It also would add to the already severe cumulative effects this project has accrued. In addition to natural resources, if a connection to I-70 involves the use of SR67, some of the same issues facing use of SR37 would arise. SR67 contains areas of urban development similar to SR37, and the local community has been operating for years with the understanding that the I-69 corridor would follow SR37.

A connection to I-65 may involve fewer impacts to the natural environment but would impact agricultural land and urban areas. Most of the land between SR37 and US31 is agricultural land. The towns of Greenwood, Whiteland, and Franklin occur along most of the US31 corridor within the study area and extend to I-65. These communities continue to merge together as they grow. Any new interstate through this area also would have some of the same issues currently facing the use of the SR37 corridor in Section 6. It is not clear what benefit would occur by choosing this alternative.

A connection to either I-70 or I-65 appears to require significantly greater distance as compared to the SR37 corridor. Any revisions to the corridor should take into account the travel times investigated during the Tier 1 process, including the travel time between Indianapolis and Evansville with the original corridor and any alternative that deviates from the approved corridor. Local travel times, such as within Section 6 only, should also be fully investigated.

It is not clear if either I-70 or I-65 could handle the level of increased traffic that would result from the added vehicles. Traffic models are critical to determine the current and proposed level of service. Even with current efforts to add travel lanes on I-65 from Franklin to I-465, traffic is still problematic. This is a major north/south corridor and adding traffic, particularly extensive truck traffic, from another major north/south corridor could cause significant travel delays and raise more safety concerns.

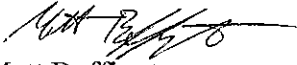
East/west connectivity was mentioned in the Tier 2 draft purpose and need goals for Section 6. If this goal is maintained, it is important to include current projects, such as the Worthsville Road project in Johnson County which is designed to address east/west connectivity in the study area. In addition, building a new interstate over new terrain can sever existing routes, potentially impacting east/west connectivity.

Sarah Rubin, (Section 6, I-69)
March 17, 2015
Page Three

It was the experience of the DFW that during the Tier 2 review process, requests to change the project design were met with considerable resistance from INDOT and FHWA. For these agencies to now propose such a drastic change seems contradictory to how the project has proceeded thus far. INDOT needs to fully explain and justify a revision to the Section 6 corridor, particularly in light of the impacts that were considered "acceptable" in Sections 1-5.

Please contact me at (317) 233-4666 if we can be of further assistance.

Sincerely,

A handwritten signature in black ink, appearing to read "Matt Buffington", with a stylized flourish at the end.

Matt Buffington
Environmental Supervisor
Division of Fish and Wildlife



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

MAR 19 2015

REPLY TO THE ATTENTION OF:
E-19J

Richard J. Marquis
Division Administrator
Federal Highway Administration – Indiana Division
575 North Pennsylvania Street, Room 254
Indianapolis, Indiana 46204

Sarah Rubin
Project Manager, I-69 Section 6
Indiana Department of Transportation
100 North Senate Avenue, Room 642
Indianapolis, Indiana 46204

Re: Scoping - Interstate 69 (Evansville to Indianapolis) Tier 2 Environmental Impact Statement for Section 6 from Martinsville to Indianapolis, Indiana.

Dear Mr. Marquis and Ms. Rubin:

The U.S. Environmental Protection Agency (EPA) has reviewed Federal Highway Administration's (FHWA) Notice of Intent (NOI) to prepare an Environmental Impact Statement (EIS) for the above referenced Indiana Department of Transportation (INDOT) project. EPA also attended the February 17, 2015, FHWA / INDOT I-69 Tier 2 Section 6 Resource Agency Scoping Meeting. Our comments are provided pursuant to the National Environmental Policy Act (NEPA) and the Council on Environmental Quality's NEPA Implementing Regulations at 40 CFR 1500-1508.

This letter with enclosure provides EPA's scoping comments and respond to your specific request for feedback during the scoping meeting regarding: 1) Purpose and Need goals, 2) Consideration of Alternatives outside the Tier 1 Corridor, 3) Schedule, and 4) Other Considerations. To assist in the NEPA EIS scoping process for this project, we have also identified several issues for your consideration in the preparation of the Tier 2 Section 6 EIS, including recommendations regarding alternatives, environmental justice, water resources, hazardous materials, air quality, greenhouse gases/climate change, noise, habitat and wildlife, noxious/invasive species, and indirect/cumulative impacts analysis.

Summary of Overall I-69 (Evansville to Indianapolis) Project Impacts

The Tier 2 Section 6 EIS is the final/last Tier 2 EIS/Record of Decision (ROD) needed to complete the EIS process for the 142-mile-long I-69 Evansville to Indianapolis Project. EPA requests that FHWA/INDOT continue to provide an updated running tally, in this case the final tally, of the impacts to resources of concern of the overall I-69 Evansville to Indianapolis project in the Section 6 EIS. In addition, since this is the final I-69 EIS, we request FHWA/INDOT also include the stream impacts and karst features impacts categories as part of the final running tally for the I-69 Evansville to Indianapolis project in the Tier 2 Section 6 EIS/ROD.

An overall impacts/permitting/tracking method was developed in consultation with EPA and the other agencies for the Tiered I-69 (Evansville to Indianapolis) Project. The summary identifies the permitting and mitigation commitments and describes the status of the activities to date associated with each commitment. We recommend the Section 6 Tier 2 DEIS disclose the details of the mitigation tracking method and include the most recent annual tracking summary in an Section 6 DEIS appendix.

I-69 Mitigation Tracking and Annual Mitigation Tracking Report

INDOT provides the permitting agencies and EPA a tracking summary on an annual basis. The last report (#4) EPA received is titled: "2013 Annual Report for the I-69 Evansville to Indianapolis Project Commitment and Mitigation Tracking" is dated January 21, 2014. As EPA requested during the February 17, 2015, Resources Agency Scoping Meeting, please send us two (2) hardcopies and two (2) CDs of the most recent annual tracking report (#5).

Schedule

Please provide EPA with at least a two-week advance notice prior to project meetings/conference calls and/or receipt of project documents for our review and comment. If the environmental review will culminate in a combined Final EIS (FEIS)/Record of Decision (ROD), then EPA recommends FHWA/INDOT convene a meeting with the resource agencies to work out any unresolved issues prior to issuing the FEIS/ROD.

We appreciate this opportunity provide initial scoping comments and offer early recommendations regarding development of the purpose and need, project goals, study area, consideration of alternatives, resources and mitigation for the I-69 Evansville to Indianapolis Tier 2 Section 6 Environmental Impact Statement. We look forward to further review and comment on this project as additional information is developed and shared with the resource agencies.

If you have any questions or concerns, I can be reached at 312-886-2910, or contact Virginia Laszewski of my staff at laszewski.virginia@epa.gov or 312-886-7501.

Sincerely,



Kenneth A. Westlake, Chief
NEPA Implementation Section
Office of Enforcement and Compliance Assurance

Enclosure

cc (via email):

U.S. Army Corps of Engineers – Louisville District, Attention: CELRL-OP-F,
P.O. Box 59, Louisville, KY 40401-0059 (James M. Townsend, Chief, Regulatory
Branch)

U.S. Army Corps of Engineers – Indianapolis Regulatory Office, 8902 Otis Avenue,
Indianapolis, Indiana 46216 (Debra Snyder)

U.S. Fish and Wildlife Service, Region 3, Bloomington Ecological Services
Office, 620 S. Walker Street, Bloomington, IN 47403-2121 (Scott
Pruitt/Robin McWilliams-Munson)

Indiana Department of Environmental Management, Office of Water Quality,
Section 401 Water Quality Certification Program, 100 N. Senate Avenue,
MC 65-40, Indianapolis, IN 46204-2251 (Randy Braun/Jason Randolph)

Indiana Department of Natural Resources, 402 W. Washington St., Rm. W264,
Indianapolis, IN 46204 (Matt Buffington)

Indiana Department of Natural Resources, Division of Historic Preservation and
Archaeology, 402 West Washington Street, room W274, Indianapolis, IN 46204
(Mitchell Zoll / John Carr/Wade Tharp)

HNTB Corporation, 111 Monument Circle, Suite 1201, Indianapolis, IN 46204
(Bill Wiedelman, Project Manager)

Lochmueller Group, 3502 Woodview Trace, Suite 150, Indianapolis, IN 47715
(Kia Gillette/Tim Miller/Mike Grovak)

**EPA Scoping Comments for the Tier 2 Environmental Impact Statement for
Section 6 from Martinsville to Indianapolis for the
I-69 Evansville to Indianapolis, Indiana Project**

The Federal Highway Administration (FHWA) Notice of Intent (NOI) identifies that FHWA and the Indiana Department of Transportation (INDOT) intend to prepare the Tier 2 Environmental Impact Statement (EIS) for Section 6 of the I-69 Evansville to Indianapolis Project.

The Tier 2 Section 6 EIS is the final of six Tier 2 EISs needed to complete the tiered EIS study/process for the 142-mile-long interstate roadway I-69 Evansville to Indianapolis Project. The NOI identifies that FHWA and INDOT are considering studying alternatives outside the SR 37 Section 6 corridor identified in the 2004 Tier 1 Record of Decision (ROD) for the I-69 Evansville to Indianapolis Project. Tier 1 Section 6 generally follows State Road (SR) 37 from SR 39 south of Martinsville north approximately 25.9 miles to I-465 in Indianapolis.

PURPOSE AND NEED, GOALS FOR TIER 2 SECTION 6

Recommendation: EPA recommends that INDOT/FHWA reaffirm and/or re-determine, as necessary, the purpose and need (i.e., identify the underlying transportation problems that need to be solved) for I-69 Evansville to Indianapolis alignment and Section 6 based, in part on updated traffic studies/analysis. We recommend prioritizing the substantiated transportation needs, identifying the major/necessary purpose and need goals (goals) for Section 6, and then developing criteria to identify potential alternatives to undergo detailed analysis in the Tier 2 Draft EIS.

STUDY AREA

The I-69 Tier 1 ROD (page 8) states: *"In general, the range of alternatives considered in a Tier 2 study will be confined to the selected Alternative 3C corridor. However, the flexibility will exist to consider alternatives outside the selected corridor to avoid significant impacts within the selected corridor. The issue of whether to consider alternatives outside the selected corridor will be determined in consultation with resource agencies in Tier 2. Any alternatives outside the selected corridor will connect all of the points listed in Section 2.1.2 above (Evansville, Oakland City, Washington, Crane Naval Surface Warfare Center, Bloomington, Martinsville, and Indianapolis), as well as connecting the project termini (I-64/I-164 interchange just north of Evansville and I-465 in Indianapolis)."*

Recommendation: The Tier 2 Section 6 Purpose and Need and Draft EIS should clearly document all relevant factors (e.g., changes since the Tier 1 ROD in environmental conditions, transportation demands, development patterns, laws, and regulations) that compel FHWA/INDOT to consider one or more new alternative corridors/routes in addition to the Tier 1 Section 6 selected SR-37 corridor for detailed analysis in the Tier 2 Section 6 EIS.

COMMUNITY INVOLVEMENT/ENVIRONMENTAL JUSTICE REPRESENTATION

Executive Order 12898 on Environmental Justice addresses disproportionate adverse impacts of federal actions on minority and low-income populations. The northern portion of Section 6 is located in Indianapolis, an urban area. Various route alternatives may go through or near communities with environmental justice (EJ) concerns. FHWA/INDOT have formed two Citizen Advisory Committees (CACs) and a Stakeholder Working Group (SWG) for Section 6. We note that the first CAC and SWG meetings were held on January 29, 2015.

Recommendation: The EIS will need to identify the minority and low-income populations potentially affected by the project, and address whether any of the alternatives would cause any disproportionate adverse impact, such as displacement, changes in existing resources or access, or community disruption. The document should also explore potential mitigation measure for any adverse environmental justice effects.

Recommendation: EPA recommends that FHWA/INDOT identify the communities with environmental justice concerns and make a special effort to identify and incorporate representatives from these communities into the two Community Advisory Committees, as soon as possible. Some of these communities may have populations that do not readily speak or read English. Consequently, information regarding this project may need to be developed in a language/form that they can understand. Interpreters may be needed at INDOT/FHWA public information meetings. The EJ outreach efforts and the results of EJ input should be well documented in the EIS.

ALTERNATIVES

Recommendation: We recommend the alternatives be based on the prioritized purpose and need/goals identified. Consider augmenting interstate highway alternatives with additional modes of transportation such as pedestrian/bicycle path and mass transit. For example, if a major need/goal for Section 6 Tier 2 is to reduce existing and/or future congestion, especially peak hours congestion on the roadway network (e.g., SR-37) in the Section 6 Study Area, then we recommend analyzing an interstate highway alternative that also includes bus rapid transit and/or High Occupancy Vehicle lanes.

AFFECTED ENVIRONMENT

To adequately consider the proposal's potential impacts on the environment, the Tier 2 Section 6 Draft EIS will need to include an updated and detailed characterization of the affected environments in the alternatives study area identified.

Recommendation: The DEIS should clearly describe the location/s of the various Section 6 interstate alternative routes and their associated potential interchanges, modifications to crossroads (e.g., overpasses/underpasses and road closure locations), access roads, frontage roads, contractor supply and staging areas, potential stormwater treatment facilities in relation to existing roadways, railroads, utilities, natural resources (e.g., wellhead protection areas, wetlands, rivers/streams, forest, etc.), schools, recreation areas, daycare centers, elderly housing, hospitals, EJ communities, residences, businesses, etc. Support the detailed descriptions with photos, figures and maps.

ENVIRONMENTAL IMPACTS

Clean Water Act (CWA) Section 404 permits and compliance with CWA Section 404(b)(1)

Guidelines – The proposal will need a Clean Water Act (CWA) Section 404 permit from the U.S. Army Corps of Engineers (Corps) for proposed discharge of dredged and fill materials to Waters of the United States. The Section 404 approval is contingent upon the project complying with the Section 404(b)(1) guidelines under the CWA. These guidelines are summarized as follows:

- **Least Environmentally Damaging Practicable Alternative (LEDPA)** – There must be no practicable alternative to the proposed discharge (impacts) which would have less adverse impact on the aquatic ecosystem, so long as the alternative does not have other significant adverse environmental consequences;
- **No Violation of Other Laws** – The proposed project must not cause or contribute to the violation of state water quality standards or toxic effluent standards, and must not jeopardize the continued existence of federally-listed endangered or threatened species of their critical habitat(s);
- **No Significant Degradation** – The project must not cause or contribute to significant degradation of Waters of the United States; and
- **Minimization and Mitigation of Adverse Impacts** – The project must include appropriate and practicable steps to avoid impacts to regulated Waters of the United States. Where impacts are unavoidable, the project must demonstrate how impacts have been minimized. The project must provide compensatory mitigation to offset unavoidable, minimized impacts to the aquatic ecosystem.

Recommendations:

- We recommend the DEIS identify the various water resources in the project area, disclose their existing conditions, and quantify impacts associated with each alternative.
- We recommend the water resources information and discussion in the DEIS demonstrate that the highway rights-of-way, potential over/under passes, interchanges, access roads, frontage roads and other ancillary project facilities avoid wetland, lake and stream impacts, to the extent feasible. Where water resources cannot be avoided, the DEIS should discuss how impacts to water resources will be minimized.
- The rationale and justification for recommending or selecting one alternative or alternative component/option over others should be presented in the DEIS.

- We recommend that wetland delineations, and wetland and stream assessments be included in the DEIS.
- We recommend the DEIS include draft wetland and stream mitigation plans, for those impacts that cannot be avoided or minimized.
- We recommend the DEIS discuss how project alternatives will address stormwater management in order to protect and, if feasible, enhance water resources in the watershed. We recommend that stormwater management capacity accommodate flows from more frequent and intense storm events. All stormwater runoff should be directed to stormwater detention basins for pretreatment prior to discharge into Waters of the U.S. The DEIS should identify the potential locations for the alternatives' stormwater treatment facilities.
- For information regarding stormwater management and stormwater management best practices see EPA's website:
http://www.epa.gov/greeningepa/stormwater/best_practices.htm.

Surface Water and Groundwater Quality/Quantity – The DEIS will need to clearly describe water bodies, streams, and ground water resources and wellhead protection areas within the analysis areas.

Recommendations:

- Impacts of the various alternatives on water quality should address, but not be limited to, a water body's designated use and compliance with Indiana's Water Quality Standards and CWA, Section 401 Water Quality Certification. The DEIS should also identify whether or not water bodies located in or near the various proposed alternative corridors are listed by Indiana as impaired, and, if so, are part of a Total Maximum Daily Load (TMDL) plan. If impaired waters are identified, the DEIS should identify the impairment/s and the reason/s for the impairment/s. The Project's impacts on TMDL's should be analyzed and disclosed in the DEIS, and mitigation identified.
- We recommend giving special attention to work that would occur in or near an identified well head (drinking water) protection zone, or upstream of a drinking water intake. While the DEIS would most likely not identify the specific locations of public and private drinking water supply intakes or wells, impacts to these resources should be evaluated and mitigation measures identified, if applicable.
- We recommend identifying and discussing details regarding the widths of proposed stream/river crossings and how these crossings will be accomplished. Where feasible, we recommend bridging across streams/ivers and their associated 100-year floodplains. Where bridging is not feasible, we recommend use of open-bottom culverts. Crossings

should be designed to accommodate stream flow under various weather conditions, preserve or enhance aquatic habitat, and provide for wildlife crossings.

Construction/Operation Impacts – Stormwater and Erosion and Sediment Control - As you are aware, FHWA, INDOT, Indiana Department of Environmental Management (IDEM) and EPA have received and continue to receive numerous citizen complaints regarding sediment and erosion control concerns associated with construction for I-69 Section 4 and Section 5. Many of these complaints appear to come after frequent and/or heavy precipitation events.

Recommendations: We recommend the Section 6 DEIS identify and discuss the specific measures INDOT and FHWA will take to insure that adequate sediment and erosion controls to protect water quality will be undertaken for construction and operation of Section 6.

The DEIS should identify and discuss whether NPDES Clean Water Act Section 402 storm water construction permits may be required. We recommend the permitting agency and contact information be disclosed in the DEIS.

We recommend disclosing potential impacts to water resources from erosion and/or spread of aquatic nuisance species associated with project construction and operation. We also recommend the DEIS identify mitigation measures to protect upland and aquatic resources.

HAZARDOUS MATERIALS

Events such as construction equipment spills of hazardous or toxic materials could result in substantial adverse impacts to surface and ground water quality and aquatic habitats. The construction and operation of roadways can result from accidental releases of oil or hazardous materials due to accident related spills.

Recommendations: We recommend the DEIS discuss the frequency or likelihood of such events, and describe spill prevention and spill and release response capabilities. We also recommend the DEIS disclose how INDOT intends to prevent potential non-point sources of pollution from project proposed activities be designed into the project and identified in the EIS. We recommend the EIS describe these spill prevention measures and capabilities, along with any necessary emergency plan or mitigation of spills in emergencies for all sections of the roadway and all construction and use phases of the roadway's life.

AIR QUALITY

The EIS will need to identify and discuss the potential impacts to air quality from construction and operation of the proposed project. The air quality analysis should address and disclose the project's potential effect on: 1) all criteria pollutants under the National Ambient Air Quality Standards (NAAQS), including ozone; 2) any significant concentrations of hazardous air pollutants; and 3) protection of public health. Mitigation measures should be identified.

Air Quality – Conformity – Morgan, Marion, Hendricks and Johnson Counties, Indiana are part of the Central Indiana area that is maintenance for the 1997 8-hour ozone standard. In addition, Morgan, Marion, Hendricks and Johnson Counties are part of the Central Indiana fine particulate matter area that is currently maintenance for the annual PM2.5 standard. Morgan County is also a sulfur dioxide (SO2) nonattainment area.

Recommendation: The Section 6 DEIS should discuss air quality conformity requirements. The preferred alternative will need to be included in the regional conformity analyses for both ozone and PM2.5. The EIS should provide a discussion regarding conformity with the State Implementation Plan for both pollutants. Tony Maietta is EPA Region 5 Air and Radiation Division contact for this project and may be reached by calling 312/353-8777 or by email at maietta.anthony@epa.gov.

Mobil Source Air Toxics (MSATs) Analysis - With the exception of the Bloomington portion of Sections 4 and 5, the Section 6 corridor is located in a more populated and urban environment than previously studied I-69 Sections. In addition, FHWA/INDOT may determine that alternatives outside the Tier 1 identified Section 6 corridor need to be identified and undergo detailed analysis in the Tier 2 Section 6 DEIS.

Recommendation: EPA recommends the Section 6 DEIS provide a more comprehensive and detailed assessment of air quality associated with construction and operation of the project than had been presented in previous Tier 2 I-69 studies. We recommend the Section 6 DEIS include a quantitative Mobile Source Air Toxics analysis and identify the potential for adverse health impacts to children and other susceptible populations who live, work or attend school/daycare in the project area. If alternatives outside the Tier 1 identified Section 6 SR-37 corridor are to undergo detailed analysis in the DEIS, then the DEIS should provide the MSATs study results in an alternatives comparative format.

Construction Impacts Air Quality - Exposure to diesel exhaust by construction workers and those nearby a construction site can have serious health implications.

Recommendation: The Section 6 DEIS should identify and discuss the impacts to construction workers and to other adults and children that live, attend school, daycare or work nearby from diesel exhaust during project construction. In order to protect air quality in the project area during construction, we recommend INDOT consider strategies to reduce diesel emissions. The Section 6 DEIS should discuss the feasibility of utilizing strategies to reduce diesel emissions, such as project construction contracts that require the use of equipment with clean diesel engines and the use of clean diesel fuels, and limits on the length of time equipment is allowed to idle when not in active use (EPA recommends idling not exceed 5 minutes). In addition, we continue to recommend that INDOT develop and implement an I-69 construction emissions reduction plan to use for Section 6.

Greenhouse Gases (GHGs) and Climate Change

We recommend that climate change issues be analyzed consistent with the Council on Environmental Quality's (CEQ) December 2014 revised draft guidance for Federal agencies' consideration of GHG

emissions and climate change impacts when conducting environmental reviews under NEPA. Accordingly, we recommend the draft EIS include an estimate of the GHG emissions associated with the project, qualitatively describe relevant climate change impacts, and analyze reasonable alternatives and/or practicable mitigation measures to reduce project-related GHG emissions. More specifics on those elements are provided below. In addition, we recommend that the NEPA analysis address the appropriateness of considering changes to the design of the proposal to incorporate GHG reduction measures and resilience to foreseeable climate change impacts. The Draft and Final EIS should make clear whether commitments have been made to ensure implementation of design or other measures to reduce GHG emissions or to adapt to climate change impacts.

More specifically, we suggest the following approach:

“Affected Environment” Section

- Include in the “Affected Environment” section of the Draft EIS a summary discussion of climate change and ongoing and reasonably foreseeable climate change impacts relevant to the project, based on U.S. Global Change Research Program¹ assessments, to assist with identification of potential project impacts that may be exacerbated by climate change and to inform consideration of measures to adapt to climate change impacts. (Among other things, this will assist in identifying resilience-related changes to the proposal that should be considered).

“Environmental Consequences” Section

- Estimate the GHG emissions associated with each alternative analyzed. Example tools for estimating and quantifying GHG emissions can be found on CEQ’s NEPA.gov website². For actions which are likely to have less than 25,000 metric tons of CO₂-e emissions/year, provide a qualitative estimate unless quantification is easily accomplished. *In most cases quantification of GHG emissions involves a relatively straightforward calculation* [If appropriate: In addition to estimating emissions caused by the proposal itself, we recommend estimating the reasonably foreseeable emissions from “upstream” and “downstream” activities indirectly caused by the proposal].³

¹ <http://www.globalchange.gov/>

² https://ceq.doe.gov/current_developments/GHG_accounting_methods_7Jan2015.html

³ Recognizing that climate impacts are not attributable to any single action, but are exacerbated by a series of smaller decisions, we do not recommend comparing GHG emissions from a proposed action to global emissions. As noted by the CEQ revised draft guidance, “[t]his approach does not reveal anything beyond the nature of the climate change challenge itself: [t]he fact that diverse individual sources of emissions each make relatively small additions to global atmospheric GHG concentrations that collectively have huge impact.”

- The estimated GHG emissions can serve as a reasonable proxy for climate change impacts when comparing the proposal and alternatives. In disclosing the potential impacts of the proposal and reasonable alternatives, consideration should be given to whether and to what extent the impacts may be exacerbated by expected climate change in the action area, as discussed in the “affected environment” section

Describe measures to reduce GHG emissions associated with the project, including reasonable alternatives or other practicable mitigation opportunities and disclose the estimated GHG reductions associated with such measures. The DEIS alternatives analysis should, as appropriate, consider practicable changes to the proposal to make it more resilient to anticipated climate change. EPA further recommends that the Record of Decision/FONSI commits to implementation of reasonable mitigation measures that would reduce or eliminate project-related GHG emissions.

Climate Change/Increased Frequency and Intensity of Precipitation Events - Increased frequency and intensity of precipitation events due to climate change can be anticipated during construction and operation of Section 6.

Recommendation: We recommend the DEIS identify and discuss how such precipitation events might impact the proposed project and its associated facilities during construction and operation. We recommend that the DEIS identify and discuss any anticipated effects of climate change on the project and possible adaptation measures. For example, discuss the effects that predicted increases in the number and/or intensity of precipitation events associated with climate change may have on sizing bridge spans, culvert openings, and stormwater management measures in order to accommodate such events and ensure project longevity, public health, and safety.

Noise – Construction and/or operational activities associated with Section 6 may cause an increase in local noise levels. Mitigation measures may include, but are not limited to, the use of noise walls/barriers, placement of trees and shrubs, sound-proofing structures, and the use of construction equipment that emit the lowest levels of noise possible.

Recommendations: We recommend the DEIS identify and discuss the sources of short-term and long-term noise pollution and the mitigation measures that will be implemented, consistent with FHWA/INDOT noise analysis and mitigation protocols.

Community, Social and Economic Impacts – There may be impacts to communities as well as social or economic impacts as a result of the construction and operation of the roadway.

Recommendation: We recommend the DEIS identify and address the social and economic impacts this project may have on communities, including all relocations associated with each alternative evaluated. This would include, but is not limited to, identifying the duration of proposed construction and/or modification activities in the various communities. The DEIS should discuss impacts to existing roads due to project-related heavy equipment use and any extra law enforcement that may be necessary to maintain law and order and traffic safety.

Biological Resources, Habitat and Wildlife – This proposed long linear roadway would impact a variety of habitats, including but not limited to, wetlands, rivers/streams, and forests.

Recommendation (Baseline Information): We recommend the DEIS provide up-to-date baseline conditions of the habitats and populations of the covered species. Avoid impacting wetlands, streams/rivers, forest and other sensitive habitats. Forests provide valuable habitat for wildlife and protect surface water and ground water quantity and quality, in part, by providing soil stabilization in a watershed. Core forest areas provide valuable breeding, feeding and resting areas for forest interior dwelling birds.

Recommendations (forests): We recommend the DEIS assess and disclose impacts to the various habitats associated with the alternatives analyzed. Assessment of impacts to forest should include, but not be limited to, disclosing the locations and the amount of forest fragmentation/forest edge produced and the amount of core forest that would be lost for each alternative evaluated in the DEIS. If possible, we recommend alternatives be located to avoid forest fragmentation and loss of core forest. Where impacts cannot be avoided and minimized, EPA recommends the project proponents undertake voluntary mitigation for tree loss that is due to the project. We recommend a 1:1 replacement with native saplings in the watershed where the tree loss takes place.

Recommendation (petitioned, listed threatened and endangered species): We recommend that the EIS identify all petitioned and listed threatened and endangered species and critical habitat that might occur in the project area, identify and quantify which species or critical habitat might be directly, indirectly, or cumulatively affected by each alternative, and mitigate impacts to these species. In addition to INDOT/FHWA consulting with the U.S. Fish and Wildlife Service, we also recommend INDOT/FHWA coordinate with the Indiana Department of Natural Resources (INDNR) to ensure that current and consistent surveying, monitoring, and reporting protocols are applied in protection and mitigation efforts.

Noxious Weeds and Exotic Species – The spread of noxious weeds and exotic (non-indigenous) plants is a threat to biodiversity and ecosystem health. Many noxious weeds can out-compete native plants and produce a monoculture that has little or no plant species diversity or benefit to wildlife. Noxious weeds tend to gain a foothold where there is disturbance in the ecosystem. Studies show that new roads and pipeline/utility rights of way can become pathways for the spread of invasive plants. Early recognition and control of new infestations is essential to stopping the spread of infestation and avoiding future widespread use of herbicides, which could correspondingly have more adverse impacts on biodiversity and nearby water quality.

Recommendations: We recommend that a vegetation management plan be prepared and included in the DEIS to address control of such plant intrusions during construction and operation. The plan should list the noxious weeds and exotic plants that occur in the resource areas. In cases where noxious weeds are a threat, EPA recommends the document detail a strategy for prevention, early detection of invasion,

and control procedures for each species. Consider planting and maintaining portions of the project right of way in native habitat, such as prairie.

Indirect/Secondary (Induced Development) and Cumulative Impacts Assessments - The indirect/secondary development impacts and cumulative impacts assessments will be important components of this Section 6 DEIS. The assessments should help guide decisions regarding the need for and the extent of a component/option for a particular area along the Tier 1 identified Section 6 corridor or, if applicable, alternatives located outside the Tier 1 identified Section 6 corridor. In addition to induced secondary development associated with interchange and east-west connections, the location and extent of access/frontage roads should be given careful consideration. Of particular concern are impacts associated with secondary development to communities with environmental justice concerns, health issues and resources of concern, including but not limited to, wetlands, rivers/streams, surface water and groundwater quality/quantity, and wildlife habitat/forest land.

From: [Rubin, Sarah](#)
To: ["Miller, Tim"](#); [William Wiedelman](#); [Ferlo, Albert M. \(Perkins Coie\)](#); [Hilden, Laura](#); [Bales, Ronald](#)
Cc: [HETRICK, KEVIN](#)
Subject: FW: I-69 Section 6 Agency Comments
Date: Thursday, March 19, 2015 2:38:27 PM
Attachments: [image001.png](#)
Importance: High

All:

Please see IDEM's comments to our 2/17 meeting below.

Sarah Rubin

Deputy Director of Public-Private Partnerships

Project Manager, I-69 Section 6

Office: (317) 234-5282



From: RANDOLPH, JASON
Sent: Thursday, March 19, 2015 2:19 PM
To: Rubin, Sarah; HETRICK, KEVIN
Cc: CLARK METTLER, MARTHA; Braun, Randy; McWilliams, Robin; Buffington, Matt; Virginia Laszewski; Snyder, Deborah D LRL; 'michelle.allen@dot.gov'
Subject: I-69 Section 6 Agency Comments
Importance: High

Mr. Hetrick & Ms. Rubin:

This email is in response to the information presented at the I-69 Section 6 agency meeting held February 17, 2015. Since the corridor study is in its infancy, IDEM recommends that any proposed study analysis avoids the portion of SE Hendricks and SW Marion Counties bordered by 6 Points Road to the north, SR 67 to the east, I-70 to the west, and County Line Road to the south. There are significant compensatory mitigation properties located in this portion of the study boundary. In total there is over 450 acres of compensatory mitigation required by Section 401 and 404 as well as USFWS Indiana Bat mitigation. IDEM also recommends avoidance of the heavily forested deep ravine area located south of SR 42 between SR 67 and SR 39.

Thank you for allowing IDEM the opportunity to provide comments. If you have any questions feel free to contact me via email or at the phone number or address listed below.

Jason Randolph
Wetlands Project Manager
IDEM Office of Water Quality
100 N. Senate Avenue
IGCN Room 1255
Indianapolis, IN 46204
Office: 317-233-0467
Fax: 317-232-8406

From: [Rubin, Sarah](#)
To: [William Wiedelman](#); ["Miller, Tim"](#); [Bales, Ronald](#); [Hilden, Laura](#); [Ferlo, Albert M. \(Perkins Coie\)](#)
Cc: [HETRICK, KEVIN](#)
Subject: FW: I69 Section 6 comments
Date: Thursday, March 19, 2015 3:34:48 PM
Attachments: [image001.png](#)

All:

Please the comments below provided by USFWS.

Sarah Rubin

Deputy Director of Public-Private Partnerships

Project Manager, I-69 Section 6

Office: (317) 234-5282



From: McWilliams, Robin [mailto:robin_mcwilliams@fws.gov]
Sent: Thursday, March 19, 2015 3:29 PM
To: Rubin, Sarah; HETRICK, KEVIN
Subject: I69 Section 6 comments

Dear Sarah and Kevin,

I have not had time to prepare official comments on the I69 Section 6 agency meeting. Obviously our agency's primary concern will be for federally listed species and their habitat including the Indiana bat and the northern long-eared bat (proposed to be listed April 2015). To that extent, alternatives that require extensive tree-clearing or crossing of the White River would certainly raise red flags for us. As Jason Randolph mentioned, there are numerous mitigation areas in the vicinity of the Indianapolis Airport in southern Marion/Hendricks County as well as northern Morgan County, including Sodalis Nature Park which contains numerous Indiana bat and northern long-eared bat records. We will also be conducting mist net surveys this summer along the existing SR 37 alternative and will likely be able to obtain additional roosting and foraging information for both bat species.

We support recommendations made by other resource agencies, including the IDNR, Division of Fish and Wildlife, and IDEM, Office of Water Quality.

We appreciate the opportunity to provide input at this stage of project planning.
Sincerely,

Robin

Robin McWilliams Munson

U.S. Fish and Wildlife Service
620 South Walker Street
Bloomington, Indiana 46403
812-334-4261 Fax: 812-334-4273